

October 28, 1999

Mr. Robert Norway
RR1 Box 576
Dewey Road
Mexico, NY 13114

Dear Mr. Norway:

This letter responds to the Petition you filed on April 5, 1999, pursuant to Section 2.206 of Title 10 of the *Code of Federal Regulations* (10 CFR 2.206), as acknowledged in our letter to you on June 9, 1999. In your Petition you requested that the U.S. Nuclear Regulatory Commission (Commission or NRC) take action with regard to Niagara Mohawk Power Corporation (NMPC) and its senior nuclear and corporate management for allegedly altering and causing public release of documents about your performance, and for misrepresenting the findings of an Administrative Law Judge in the related U.S. Department of Labor discrimination case. Your request was referred to me pursuant to 10 CFR 2.206. The enclosed Final Director's Decision (Decision) addresses the issues you raised in your Petition.

I have complied with your request to forward your complaint to the NRC's Office of the Inspector General for an investigation of possible deliberate misconduct on the part of the NRC staff. I made that referral on May 17, 1999. In a separate letter dated October 6, 1999, the NRC has addressed your safety concern regarding the residual heat removal safety evaluation report independent of this Decision. While I understand that your petition is not intended to address the 1996 discrimination case, the NRC staff previously concluded that NMPC had violated 10 CFR 50.7 and issued a Notice of Violation and Proposed Imposition of Civil Penalty on July 24, 1996. I appreciate your additional concerns; however, we are unable to take additional actions on your remaining requests for the reasons explained in the enclosed Decision.

A copy of the Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c). As provided by this regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time.

I have also enclosed a copy of the notice of "Issuance of Final Director's Decision Under 10 CFR 2.206" that has been filed with the Office of the Federal Register for publication.

Although we do not support several of your requests, we recognize your efforts to bring these issues to our attention and appreciate your interest in and concern for ensuring public health

R. Norway

- 2 -

and safety and the continued operational safety of nuclear power reactors. Please feel free to contact Mr. Darl Hood, Project Manager, at 301-415-3049 (e-mail dsh@nrc.gov) to discuss these or any future concerns you have regarding NMPC or the Nine Mile Point Nuclear Station.

Sincerely,

/S/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosures: 1. Director's Decision 99-13
2. *Federal Register* Notice

cc w/encls: See next page

R. Norway

- 2 -

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Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

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R. Norway

- 3 -

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF NUCLEAR REACTOR REGULATION
Samuel J. Collins, Director

In the Matter of)	Docket Nos. 50-220 and 50-410
)	
NIAGARA MOHAWK POWER CORPORATION)	License Nos. DPR-63 and NPF-69
)	
(Nine Mile Point Nuclear Station,)	
Unit Nos. 1 and 2))	

FINAL DIRECTOR'S DECISION UNDER 10 CFR 2.206

I. INTRODUCTION

By letter dated April 5, 1999 (the Petition), pursuant to Section 2.206 of Title 10 of the Code of Federal Regulations (10 CFR 2.206), Mr. Robert Norway (the Petitioner) requested that the Nuclear Regulatory Commission (Commission or NRC) take action with regard to Niagara Mohawk Power Corporation (NMPC) and its senior nuclear and corporate management. Specifically, the Petitioner requested that the Commission (1) take enforcement action against NMPC and its senior nuclear and corporate management and, as a minimum, against three named individuals, for submitting an altered 1994 employee record to the NRC at a predecisional enforcement conference (PEC) on May 10, 1996; (2) take enforcement action against these same parties for presenting at this PEC a false written record of what the Administrative Law Judge (ALJ) determined in the Department of Labor (DOL) proceeding in 95-ERA-005; (3) take enforcement action against these same parties for the placement of confidential employee information into the public record in violation of 10 CFR 2.790; and (4) take enforcement action against these same parties for an additional act of discrimination, pursuant to 10 CFR 50.7, for destroying the Petitioner's credibility and reputation in the nuclear

industry. The Petitioner also requested that the NRC forward these issues to the Department of Justice for consideration of criminal prosecution.

In addition to these requests for enforcement actions, the Petitioner also requested that the following other actions be implemented: (1) that the agency perform an independent review of all of NMPC's docketed files associated with the individuals who committed the alleged fraud; (2) that the NRC forward the Petitioner's complaint to the NRC's Office of the Inspector General for an investigation of possible deliberate misconduct on the part of the NRC staff; (3) that an independent oversight group be established to oversee the NMPC Human Resources Department and Employee Concerns Program; (4) that a public meeting be held to obtain public comments pertaining to issues of discrimination and the placement of fraudulent documentation into public records; and (5) that the NRC publicly post NMPC's Residual Heat Removal Alternate Shutdown (RHR ASD) Cooling Safety Evaluation 96-091 to make it available for public comment, or require NMPC to re-perform this safety evaluation.

II. BACKGROUND

As a basis for the requests described above, the Petitioner asserted in his Petition of April 5, 1999, that NMPC deliberately created a false employee record and fraudulently submitted this record, as well as a false written record of an ALJ decision, into the public record, under false pretenses and perjury, during a 1996 PEC with the NRC.¹

¹The 1996 PEC enabled the NRC staff to reach its conclusion that NMPC terminated the Petitioner in February 1994 for raising safety concerns to his employer beginning in 1991. The NRC staff concluded that, based upon the DOL ALJ's Recommended Decision and Order in DOL Case 95-ERA-005, dated March 15, 1996, NMPC had violated 10 CFR 50.7. A Notice of Violation and Proposed Imposition of Civil Penalty in the amount of \$80,000 was issued to NMPC on July 24, 1996 (EA 96-116). At the time of the PEC, NMPC planned to appeal the ALJ's decision, but the case was subsequently settled by agreement among the parties before the appeal. The DOL's Administrative Review Board (ARB) approved the settlement agreement and dismissed the complaint with prejudice (see Final Order Approving Settlement and Dismissing Complaint, ARB Case No. 97-018 dated November 22, 1996). On December 16, 1996, NMPC paid the civil penalty imposed by the NRC.

Regarding the alleged false written record of an ALJ decision, Mr. James Lieberman, who was then Director of the NRC's Office of Enforcement, wrote a letter to the Petitioner on May 3, 1999. In this correspondence, Mr. Lieberman stated that the transcript of the enforcement conference was reviewed and indicated that the NRC staff understood that the document was the position of NMPC management and not that of the ALJ.

On May 10, 1999, the NRC Project Manager, Darl Hood, called to inform the Petitioner that the NRC's Petition Review Board had determined that the Petition did not raise issues of an immediate nature, and that the Director's Decision would be issued in October 1999. In a letter dated June 9, 1999, Mr. Roy Zimmerman, Acting Director of the Office of Nuclear Reactor Regulation, acknowledged receipt of the Petition.

In addition to the requests related to the alleged fraud, the Petitioner also submitted a technical concern over his continued efforts to address RHR ASD cooling issues. In a letter dated October 6, 1999, the NRC staff addressed the Petitioner's technical concern independent of this Final Director's Decision.

III. DISCUSSION

1. THE NRC SHOULD TAKE ENFORCEMENT ACTION AGAINST NMPC AND ITS SENIOR NUCLEAR AND CORPORATE MANAGEMENT AND, AS A MINIMUM, AGAINST THREE NAMED INDIVIDUALS, FOR SUBMITTING AN ALTERED 1994 EMPLOYEE RECORD TO THE NRC AT THE PEC ON MAY 10, 1996

The document at issue was related to the Petitioner's performance evaluation associated with an employee reduction (rightsizing) program that occurred at the Nine Mile Point facility in 1994. The NRC placed a redacted copy of this document into the Public Document Room as an attachment to the 1996 Notice of Violation to NMPC. The NRC staff

removed the Petitioner's name from this employee assessment, and from the other handouts given to the staff by NMPC management at the 1996 PEC.

The DOL ALJ noted with reference to the document at issue that there were irregularities in the various handwritings on the worksheet and, therefore, had not relied upon the document at issue in his Recommended Decision and Order dated March 15, 1996. The copy of the employee evaluation that the NRC redacted and placed in the Public Document Room differs from the copy submitted to the ALJ. The copies differ in that the NRC's copy does not include the name of the Petitioner's supervisor. The supervisor's name was known to the NRC and was mentioned at the PEC (Transcript at page 24). A comparison of the ALJ and NRC copies of the document (attachments 4 and 5 to the Petition) indicates that the documents are identical except for the absence of the supervisor's name. Neither copy bears the supervisor's signature. The March 15, 1994 letter to the Petitioner from NMPC management stated that the initial evaluation made by the Petitioner's supervisor did not place the Petitioner in the list of employees to be assessed by a Review Board process for rightsizing, but that a subsequent Senior Management planning session resulted in changes that did include the Petitioner in the group to be reviewed. Based on the absence of the supervisor's signature on both copies at issue and the clarification provided in the March 15, 1994 letter, there is no evidence that the supervisor's name was forged but rather included on the document as a statement of fact regarding the identity of the supervisor. Since there is no meaningful difference between the copies used during the DOL proceeding and that used at the PEC, the different handwriting observed by the ALJ and the missing name on the copy released by the NRC do not alter the substance of the documents and would not lead to a reviewer drawing different conclusions from the documents and, therefore, are of no consequence and are not in violation of 10 CFR 50.5, "Deliberate misconduct," or 10 CFR

50.9, "Completeness and accuracy of information." The document at issue did not affect the NRC decision to issue its enforcement action against NMPC (Severity Level II Notice of Violation and \$80,000 Civil Penalty issued on July 24, 1996), since the NRC staff relied primarily upon the DOL ALJ decision in this case.

The Petitioner has not demonstrated that NMPC, its senior nuclear and corporate managers, or the three individuals named in the Petition, deliberately submitted to the NRC information that the person submitting the information knew to be incomplete or inaccurate in some respect material to the NRC. For this reason, and the reasons stated above, the Petitioner has not offered a sufficient basis that would warrant the NRC to take enforcement action against NMPC, its senior nuclear and corporate managers, or the three named individuals.

2. THE NRC SHOULD TAKE ENFORCEMENT ACTION AGAINST THESE SAME PARTIES FOR PRESENTING AT THIS PEC A FALSE WRITTEN RECORD OF WHAT THE ALJ DETERMINED IN THE DOL PROCEEDING IN 95-ERA-005

The Petitioner states that documentation was placed into federal custody and into the public record without accurately documenting the findings made by the ALJ upon these allegations. Specifically, the document, titled "Findings of the Administrative Law Judge," is allegedly inaccurate because its contents are not the findings of the ALJ (as implied by the title), but rather are the assertions of NMPC management. As mentioned previously, Mr. Lieberman stated in correspondence to the Petitioner dated May 3, 1999, that the NRC staff had reviewed the transcript of the PEC and determined that the NRC staff at the PEC understood that the document at issue represented the position of NMPC management and not that of the DOL ALJ. The staff notes that the opening document for NMPC's presentation, titled "Agenda," uses a more accurate title of "Discussion of Findings of the Administrative Law

Judge.” The NRC staff agrees with the Petitioner that the shortened title, “Findings of the Administrative Law Judge,” does not accurately describe the document’s contents, but the document’s contents are clear when viewed in conjunction with the other documents that NMPC used during the PEC. In addition to NMPC’s opening “Agenda,” the NRC staff understood during the PEC that NMPC’s disagreements with the ALJ’s decision, that are expressed in this document, were the bases for the statement in NMPC’s closing document, titled “Enforcement History,” that NMPC did “[i]ntend to appeal the ALJ’s decision in this case.” Therefore, the inaccuracy created by the shortened title was of no consequence to the NRC, and does not constitute a “false record.” When viewed in context with the other documents placed in the public record, the record is sufficiently clear that the document in question presents the views of NMPC management about the ALJ’s decision. The staff concludes that NMPC did not submit a false written record of the ALJ’s determination in the DOL proceeding in 95-ERA-005 and, therefore, no action to correct, clarify, or otherwise alter the public record is warranted.

3. THE NRC SHOULD TAKE ENFORCEMENT ACTION AGAINST THESE SAME
PARTIES FOR PLACING CONFIDENTIAL EMPLOYEE INFORMATION INTO THE
PUBLIC RECORD IN VIOLATION OF 10 CFR 2.790

The documentation at issue was part of the record of the PEC with NMPC in 1996. Neither NMPC nor its senior nuclear and corporate managers placed confidential employee information into the public record in violation of 10 CFR 2.790. This regulation states that subject to certain exceptions, correspondence to and from the NRC regarding a violation will be made available for inspection and copying at the NRC’s Public Document Room. While one of these exceptions relates to personnel or medical files, the release of which would constitute an unwarranted invasion of personal privacy, the documentation dealing with

confidential employee information, including the Petitioner's name, was fully redacted before being released to the Public Document Room.

As noted by Mr. Lieberman in his May 3, 1999, correspondence to the Petitioner, documents submitted by licensees are generally matters of public record and are placed in the NRC's Public Document Room. Because the document was fully redacted, there was no basis to grant the Petitioner's request to have this documentation removed from the Public Document Room. Equally, the Petitioner has not offered a sufficient basis that would warrant the NRC to take enforcement action against these parties for a violation of 10 CFR 2.790.

4. THE NRC SHOULD TAKE ENFORCEMENT ACTION AGAINST THESE SAME PARTIES FOR AN ADDITIONAL ACT OF DISCRIMINATION, PURSUANT TO 10 CFR 50.7, FOR DESTROYING THE PETITIONER'S CREDIBILITY AND REPUTATION IN THE NUCLEAR INDUSTRY

The Petitioner requests that the NRC take enforcement action against NMPC and its senior nuclear and corporate management for destroying the Petitioner's credibility and reputation in the nuclear industry. The Petitioner has not submitted any information related to an additional act of discrimination by NMPC, by its senior nuclear and corporate managers, or by the three individuals named in the Petition. In addition, the Petitioner has not presented any information that his credibility and reputation have been destroyed by any act of the parties named in the Petition. For this reason, and the reasons stated above, the Petitioner has not offered a sufficient basis that would warrant the NRC to take enforcement action against NMPC, its senior nuclear and corporate managers, or the three named individuals.

5. THE NRC SHOULD FORWARD THESE ISSUES TO THE DEPARTMENT OF JUSTICE FOR CONSIDERATION OF CRIMINAL PROSECUTION

Since the NRC has determined that the Petitioner has submitted no new information

that would lead the NRC staff to conclude that a 10 CFR 2.790, or an additional 10 CFR 50.7, violation² had occurred, there is no basis for forwarding these issues to the Department of Justice for consideration of criminal prosecution.

6. THE NRC SHOULD PERFORM AN INDEPENDENT REVIEW OF ALL OF NMPC'S DOCKETED FILES ASSOCIATED WITH THE INDIVIDUALS WHO COMMITTED THE ALLEGED FRAUD

Since, as stated above, the NRC has determined that the Petitioner has submitted no new information that would lead the NRC staff to conclude that a 10 CFR 2.790, or an additional 10 CFR 50.7, violation had occurred, there is no basis for performing an independent review of all of NMPC's docketed files associated with the individuals who committed the alleged fraud.

7. THE NRC SHOULD FORWARD PETITIONER'S COMPLAINT TO THE OFFICE OF THE INSPECTOR GENERAL FOR AN INVESTIGATION OF POSSIBLE DELIBERATE MISCONDUCT ON THE PART OF THE NRC STAFF

The Petitioner requested that the NRC forward a complaint to the Office of the Inspector General for an investigation of possible deliberate misconduct or negligence on the part of members of the NRC for failing to take proper action in the discrimination case, for allowing NMPC representatives to place false and fraudulent documents into NRC custody, and for allowing these documents to be placed into the public record. By memorandum dated

May 17, 1999, the Petition was forwarded to the Acting Assistant Inspector General for Investigations, Office of the Inspector General. Therefore, the NRC staff has complied with this request by the Petitioner.

²An additional violation to that issued against NMPC in 1996, EA 96-116.

8. AN INDEPENDENT OVERSIGHT GROUP SHOULD BE ESTABLISHED TO OVERSEE
NMPC'S HUMAN RESOURCES DEPARTMENT AND EMPLOYEE CONCERNS
PROGRAM

Since the NRC has determined that the Petitioner has submitted no new information that would lead the NRC staff to conclude that a 10 CFR 2.790, or an additional 10 CFR 50.7, violation had occurred, there is not a sufficient basis for establishing an independent oversight group to monitor NMPC's Human Resources Department or its Employee Concerns Program. The need for such a group is obviated by corrective actions already taken by NMPC as a result of the NRC's enforcement action. These actions, which were discussed during the PEC and in NMPC's letter dated August 23, 1996, included and were not limited to (1) reemphasizing to management the rights and responsibilities of employees to raise safety issues; (2) reinforcing, at all levels of management, the value of reporting issues to improve performance; and (3) reemphasizing the availability of the Quality First Program (a program whereby employee concerns can be identified for further investigation in confidence, if desired, with results of the investigation provided to senior management, the offsite oversight committee, and the individual reporting the concern, and with final decisions regarding disputed results residing with the Chief Nuclear Officer). Notwithstanding NMPC's prompt and comprehensive correction actions, should the NRC obtain information in the future that an oversight group may be warranted, the NRC would consider requiring such a program at that time. There is no evidence that such a need currently exists.

9. A PUBLIC MEETING SHOULD BE HELD TO OBTAIN PUBLIC COMMENTS
PERTAINING TO A NUMBER OF ISSUES, INCLUDING DISCRIMINATION AND THE
PLACEMENT OF FRAUDULENT DOCUMENTATION INTO PUBLIC RECORDS

Since the NRC has determined that the Petitioner has submitted no new information that would lead the NRC staff to conclude that a 10 CFR 2.790, or an additional 10 CFR 50.7, violation had occurred, there is not a sufficient reason to hold a public meeting to discuss discrimination, or to discuss the placement of allegedly fraudulent documents into the public record. Should a sufficient reason arise in the future, the NRC would consider holding a meeting with the public to obtain their comments on these issues at that time. There is no evidence that such a need currently exists.

10. THE NRC SHOULD PUBLICLY POST NMPC'S RHR ASD COOLING SAFETY EVALUATION 96-091 TO MAKE IT AVAILABLE FOR PUBLIC COMMENT OR REQUIRE NMPC TO RE-PERFORM THIS SAFETY EVALUATION.

As previously stated, by letter dated October 6, 1999, the NRC staff addressed the Petitioner's technical concern for the RHR ASD Cooling Safety Evaluation. The October 6, 1999, letter is publicly available through the NRC Public Document Room.

IV. CONCLUSION

For the reasons discussed above, no basis exists for taking the enforcement actions requested in the Petition. Nonetheless, as previously described, the Petitioner's complaint has been forwarded to the NRC's Office of the Inspector General. The Petitioner's technical concern, as discussed above, has been addressed by the NRC independent of this Final Director's Decision. The remaining aspects of the Petition are not supported.

A copy of this Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c). As provided for by that regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time.

- 11 -

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland
this 28th day of October 1999

UNITED STATES NUCLEAR REGULATORY COMMISSION

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-220 AND 50-410

ISSUANCE OF FINAL DIRECTOR'S DECISION UNDER 10 CFR 2.206

Notice is hereby given that the Director, Office of Nuclear Reactor Regulation, has taken action with regard to a letter dated April 5, 1999, (Petition) filed by Robert Norway (Petitioner) pursuant to Section 2.206 of Title 10 of the *Code of Federal Regulations* (10 CFR 2.206). The Petitioner requested that the U.S. Nuclear Regulatory Commission (Commission or NRC) take action with regard to Niagara Mohawk Power Corporation (NMPC) and its senior nuclear and corporate management. The Petitioner requested that the Commission (1) take enforcement action against NMPC and its senior nuclear and corporate management and, as a minimum, against three named individuals, for submitting an altered 1994 employee record to the NRC at a predecisional enforcement conference on May 10, 1996; (2) take enforcement action against these same parties for presenting at this predecisional enforcement conference a false written record of what the Administrative Law Judge determined in the Department of Labor's proceeding in 95-ERA-005; (3) take enforcement action against these same parties for placing confidential employee information into the public record in violation of 10 CFR 2.790; and (4) take enforcement action against these same parties for an additional act of discrimination, pursuant to 10 CFR 50.7, for destroying the Petitioner's credibility and reputation in the nuclear industry. The Petitioner also requested that the NRC forward these issues to the Department of Justice for consideration of criminal prosecution.

In addition to these requests for enforcement actions, the Petitioner also requested that the following other actions be implemented: (1) that the agency perform an independent review of all of NMPC's docketed files associated with the individuals who committed the alleged fraud; (2) that the NRC forward the complaint to the NRC's Office of the Inspector General for an investigation of possible deliberate misconduct on the part of the NRC staff; (3) that an independent oversight group be established to oversee the NMPC Human Resources Department and Employee Concerns Program; (4) that a public meeting be held to obtain public comments pertaining to a number of issues, including discrimination and the placement of fraudulent documentation into public records; and (5) that the NRC publicly post NMPC's Safety Evaluation 96-09, which addresses the Residual Heat Removal Alternate Shutdown Cooling for Unit 2, to make it available for public comment, or require NMPC to re-perform this safety evaluation.

The Director of the Office of Nuclear Reactor Regulation has complied with the Petitioner's request to have his complaint forwarded to the NRC's Office of the Inspector General. The Petitioner's technical concern has been addressed independent of the Director's Decision by the NRC staff's letter to the Petitioner dated October 6, 1999. The Petitioner's additional requests are not supported for the reasons that are explained in the "Final Director's Decision Pursuant to 10 CFR 2.206" (DD-99-13). The complete text of the Final Director's Decision follows this notice and is available for public inspection at the Commission's Public Document Rooms located in the Gelman Building, 2120 L Street, NW., Washington, DC, and in the Reference and Documents Department, Penfield Library, State University of New York, Oswego, New York 13126.

A copy of the Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c) of the Commission's regulations. As

provided for by this regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time.

Dated at Rockville, Maryland, this 28th day of October 1999

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Director's Decision 99-13 dated October 28, 1999

DISTRIBUTION:

Docket File (50-220 and 50-410)

PUBLIC

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