



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 16, 2018

EA 2018-045

Mr. Steve Huntington, VP of Quality Systems  
System One Solutions, LLC  
Cheswick, PA

SUBJECT: NUCLEAR REGULATORY COMMISSION OFFICE OF INVESTIGATIONS  
REPORT 3-2017-003 AND NOTICE OF VIOLATION

Dear Mr. Huntington:

This letter is in regards to an investigation initiated on November 9, 2016, by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) to determine: whether a vendor/non-licensee had willfully provided a falsified training document or willfully presented a falsified training document in violation of NRC regulations, and (2) whether System One Solutions, LLC (System One) willfully provided inaccurate information to the NRC in Event Notification 52383 pertaining to the vendor's employee(s) performing safety related work at nuclear power plants. Based on the evidence gathered during the investigation, the NRC has determined that System One personnel falsified a training document. This action caused System One to be in violation of the NRC requirement in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.5(a), "Deliberate Misconduct" which provides in relevant part that any contractor (including a supplier or a consultant) is prohibited from engaging in deliberate misconduct that causes, or would have caused if not detected, a licensee to be in violation of NRC requirements. A Factual Summary of OI Investigation Report 3-2017-003, is provided as Enclosure 1 to this letter. The NRC is also issuing a notice of violation to the former System One Quality Assurance Manager responsible for the falsification of the document, which will be implemented by separate correspondence.

Based on the results of this investigation the NRC has determined that System One committed a violation of 10 CFR 50.5(a)(1) and (2), "Deliberate Misconduct." The NRC's deliberate misconduct rule prohibits employees of a contractor that provides any goods or services related to a licensee's activities from engaging in deliberate misconduct that (1) causes or would have caused a licensee to be in violation of any regulation and (2) to deliberately submit to a licensee information that the person knows to be inaccurate in some respect material to the NRC. This violation has been determined to be a Severity Level IV violation in accordance with the NRC Enforcement Policy and is being cited because of the willfulness of the actions upon which the violation is based. The current NRC Enforcement Policy is included on the NRC's Website at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The Notice of Violation is provided as Enclosure 2 to this letter.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in Inspection Report

No. 99902053/2017-201, Agencywide Document Access and Management System (ADAMS) Accession Number ML17325B038. Therefore, you are not required to respond to this letter unless the description does not accurately reflect your 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," a copy of this letter, will be made electronically available for public inspection in the NRC Public Document Room and in ADAMS. ADAMS is accessible from the NRC Web Site at [www.NRC.gov/reading-rm/adams.html](http://www.NRC.gov/reading-rm/adams.html).

Please note that final NRC investigation documents, such as the OI report described above, may be made available to the public under the Freedom of Information Act (FOIA), subject to redaction of information appropriate under the FOIA. Requests under the FOIA should be made in accordance with 10 CFR 9.23, "Requests for Records." Additional information is available on the NRC website at <http://www.nrc.gov/reading-rm/foia/foia-privacy.html>.

If you have any questions related to this matter, please contact Mr. John Burke of my staff at 301-415-2343.

Sincerely,

***/RA McGinty Acting for/***

Paul G. Krohn  
Deputy Division Director  
Division of Construction Inspection  
and Operational Programs

Docket No.: 99902053

Enclosures:

1. Factual summary of OI Investigation  
Report No. 3-2017-03
2. Notice of Violation

SUBJECT: NUCLEAR REGULATORY COMMISSION OFFICE OF INVESTIGATIONS  
REPORT 3-2017-003 AND NOTICE OF VIOLATION

Dated: August 16, 2018

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NRO-002

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<b>OFFICEC</b>	OE	OE*	OGC	OGC
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