



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

October 4, 2016

EA-16-110

Mrs. Cheryl A. Gayheart
VP Nuclear Plant Site
Southern Nuclear Operating Co., Inc.
Joseph M. Farley Nuclear Plant
7388 North State Highway 95
Columbia, AL 36319

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – NRC INSPECTION REPORT
NO. 05000348/2016008, 05000364/2016008, NRC OFFICE OF
INVESTIGATIONS REPORT 2-2015-032 AND NOTICE OF VIOLATION

Dear Mrs. Gayheart:

On May 3, 2016, the Nuclear Regulatory Commission's (NRC) Office of Investigations (OI) completed an investigation at Joseph M. Farley Nuclear Plant to determine, in part, whether various required training exams had been falsified by contract personnel. Based on the results of the investigation, the NRC concluded that a contract employee willfully took annual requalification examinations involving site access, Fitness for Duty, and radiation worker training for at least two individuals and made inaccurate entries in training records, thereby falsely indicating that the employees completed and passed the examinations. The results of the investigation and inspection were discussed on September 28, 2016 with you and other members of your staff. Enclosed is a Factual Summary of the OI investigation and the inspection report documenting our review in this matter.

Based on a review of the facts and circumstances in this case, the NRC has determined that a Severity Level IV violation of NRC requirements and a subsequent finding of very low significance (Green) occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation was evaluated in accordance with the NRC Enforcement Policy and the NRC assessed the relative weight of the following factors to determine the significance: the low level position of the individual involved, the regulatory responsibilities imposed on this individual, the limited number of individuals involved, the very low safety significance of the underlying violation, and the potential consequences. Additionally, the NRC notes that the incident was identified by the licensee, promptly reported to NRC staff, and licensee corrective actions appeared to be thorough.

This incident is similar to a previous event at Farley Nuclear Plant involving falsification of exam results. On May 6, 2013, the NRC issued a Confirmatory Order (ADAMS Accession No. ML13127A136) for the failure to ensure that radiation worker training exams for security officers

were not compromised. Notwithstanding Southern Nuclear Company's prompt and robust corrective actions for this most recent event, the NRC remains concerned about its similarity to the previous incident. As individual integrity is essential to ensuring both nuclear and personnel safety, the NRC will focus on your assessment of the extent-of-condition as we follow up on your response to the enclosed Notice of Violation.

The violation is being cited in the Notice due to the deliberate misconduct aspects, the apparent lack of effectiveness of previous corrective actions that may have contributed to this most recent event involving falsified training exams, and the fact that unqualified workers accessed the site, accessed the radiological controlled areas of the plant, and performed fire watches. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents 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 or proprietary, information so that it can be made available to the public without redaction.

Sincerely,

/RA/

Brian R. Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No.: 50-348, 50-364
License No.: NPF-2, NPF-8

cc: Distribution via Listserv

Enclosures:

1. Notice of Violation
2. Inspection Report 05000348, 364/2016008
w/Attachment: Supplemental Information
3. Factual Summary

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☒ PUBLICLY AVAILABLE

☐ NON-PUBLICLY AVAILABLE

☐ SENSITIVE

☒ NON-SENSITIVE

ADAMS: ☒ Yes

ACCESSION NUMBER: _____

☒ SUNSI REVIEW COMPLETE ☐ FORM 665 ATTACHED

OFFICE	RII:DRS	RII:DRS	RII:DRS	RII:DRP	RII:EICS	RII:EICS	
SIGNATURE	WSP1	JRP1	BRB1	SRS5	SAP1	MXK7 FOR SES	
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Letter to Mrs. Cheryl A. Gayheart from Mr. Brian R. Bonser dated October 4, 2016.

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – NRC INSPECTION REPORT
NO. 05000348/2016008, 05000364/2016008, NRC OFFICE OF
INVESTIGATIONS REPORT 2-2015-032 AND NOTICE OF VIOLATION

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NOTICE OF VIOLATION

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant

Docket No.: 50-348, 50-364
License No.: NPF-2, NPF-8
EA-16-110

During an NRC investigation completed on May 3, 2016, and subsequent NRC in-office review, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10CFR50.9 (a) states that information provided to the Commission by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

10CFR26.29 (c)(2), Fitness for Duty Program - Training, states that licensees and other entities shall ensure that individuals who are subject to this subpart complete refresher training on a nominal 12-month frequency.

TS 5.4.1.a, "Procedures," requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in RG 1.33, Rev. 2, App. A, Feb. 1978. Section 7.e of App. A of RG 1.33 requires procedures for training workers in radiation protection. Licensee procedure FNP-0-AP-42, "Access Control," states that individuals badged as unescorted Radiation Workers must undergo annual Radiation Worker Retraining to maintain radiation controlled area (RCA) access authorization.

In addition, RG 1.33, Rev. 2, App A, Section 1.I requires procedures for a Plant Fire Protection Program. Farley administrative procedure NMP-ES-035-007, "Fleet Fire Watch Instruction," defines hot work fire watch qualifications in Section 2.5, "Definitions," with the statement: "Note that Hot Work Fire Watch personnel are qualified by gaining and maintaining the qualification, S-FP-FIREWATCH, 'SNC Fire Watch for Hot Work/Open Flame,' which ensures the initial completion and annual retraining for S-FP-200."

Contrary to the above, on January 28, 2014, in early February 2014, and in early February 2015, the licensee maintained information that was not complete and accurate in all material respects associated with annual requalification exams required by licensee procedures. Specifically, a contractor willfully took annual requalification examinations for two separate individuals and made inaccurate entries in training records, thereby falsely indicating that the employees actually took and passed the examinations. The records inaccurately showed that workers had successfully completed required annual requalification exams for fitness-for-duty, radiation worker, and fire watch training. The records are required to be maintained, and are material to the NRC because they are used as evidence of compliance with training requirements.

This is a Severity Level IV Violation.

Pursuant to the provisions of 10 CFR 2.201, Southern Nuclear Operating Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of

Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation;EA-16-110" and should include for each violation: (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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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.

Because 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>, to the extent possible, it 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, 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.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 4th day of October 2016.

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 50-348 and 50-364

License Nos.: NPF-2 and NPF-8

Report Nos.: 05000348/2016008, 05000364/2016008

Licensee: Southern Nuclear Operating Company, Inc. (SNC)

Facility: Joseph M. Farley Nuclear Plant, Units 1 & 2

Location: Columbia, AL 36319

Dates: June 20, 2016 through September 28, 2016

Inspectors: W. Pursley, Reactor Inspector
J. Panfel, Reactor Inspector

Approved by: Brain R. Bonser, Chief
Engineering Branch 1
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000348, 364/2016008; 6/20/2016 – 9/28/2016; Joseph M. Farley Nuclear Plant; Review of Office of Investigations Reports

The report covered an in-office review of NRC Office of Investigations (OI) Report No. 2-2015-032 by Region 2 inspectors. One Severity Level IV violation was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using IMC 0609, "Significance Determination Process." Findings for which the Significance Determination Process does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process" Revision 6, dated July 2016.

Cornerstones: Security, Mitigating Systems, Occupational Radiation Safety

Severity Level IV/Green: The licensee identified a violation of 10 CFR 50.9(a) requirements and an associated finding of very low significance when it was determined that an employee deliberately completed requalification examinations for other employees without their knowledge or consent. Specifically, on three occasions the proctor took annual requalification exams of Fitness-for-Duty, radiation worker, and fire watch training for two other contract employees and made inaccurate entries in training records thereby falsely indicating that the employees actually attempted and passed the examinations. The records inaccurately showed that workers had successfully completed required annual requalification exams for fire watch, fitness for duty and radiation worker training. The licensee was notified about the incident through their employee concerns program and informed the NRC about the concern.

Since the finding involved occupational radiation safety, the inspectors utilized IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," dated August 19, 2008, to assess its significance. The inspectors determined that the finding did not involve an overexposure; a substantial potential for an overexposure; a compromised ability to assess dose; or unplanned, unintended occupational collective dose. Consequently, the inspectors determined that the finding was of very low safety significance (Green).

The inspectors determined that the finding has a cross-cutting aspect in the area of human performance, field presence, because the licensee did not ensure management oversight of contractor work activities (H.2).

This issue was also dispositioned using traditional enforcement due to the willful aspects of the violation. Furthermore, the failure to provide complete and accurate information has the potential to impact the NRC's ability to perform its regulatory function. In accordance with the guidance of the Enforcement Policy and Enforcement Manual, this issue is considered a Severity Level IV violation because it involved information that the NRC required to be maintained by a licensee that was incomplete or inaccurate and of more than minor significance.

4. OTHER ACTIVITIES

Cornerstones: Security, Mitigating Systems, Occupational Radiation Safety

4OA5 Other Activities

a. Inspection Scope

The inspectors reviewed the OI summary and transcripts of interviews conducted by OI investigators related to annual requalification examinations conducted by contract personnel to determine if violations of regulatory requirements occurred. In addition, the inspectors reviewed related licensee training program procedures and policies and discussed specific program requirements with licensee staff.

b. Findings

Introduction: A Severity Level IV violation of 10 CFR 50.9(a) and accompanying Green finding were identified by the licensee after a contract employee test proctor deliberately completed several annual requalification exams for other employees in 2014 and 2015. This resulted in inaccurate documentation of training records for individuals performing Fitness-for-Duty (FFD), fire watch, and radiation safety activities.

Description: On February 13, 2015, the licensee advised the NRC that they had received information from Site Employee Concerns that a contract employee test proctor may have taken exams for multiple contract employees without their authority or knowledge. This information was admitted into the licensee's corrective action program as condition report (CR) 10029632 and the licensee initiated their own investigation. The licensee concluded that a contract test proctor completed three exams for two other contract employees. This resulted in falsification of licensee training records documenting the two workers' qualification to perform certain tasks. The types of exams incorrectly completed were the annual FFD refresher exam, the annual radiation worker training (RWT) exam, and the fire watch exam.

The Region II Office of Investigations (OI) initiated an investigation on May 7, 2015, to determine whether various required training exams had been falsified and whether contractor management failed to report the indiscretions. RII OI investigators substantiated that on separate occasions the proctor deliberately completed annual training exams on behalf of other employees and subsequently falsified the associated training records to show the employees had satisfied the training requirements. OI substantiated that the test proctor deliberately took the 2014 annual exams for a contract welder and the 2014 and 2015 annuals for a contract foreman.

The inspectors reviewed the transcripts and evidence obtained during the OI investigation. The inspectors agreed with the OI conclusion that the FFD, RWT, and fire watch exams were compromised and that the test proctor took these exams, thereby disregarding established licensee policy, NMP-TR-208, "Examination and Examination Security," Version 5.0.

The licensee entered the issue into their corrective action program and performed a root cause evaluation (CAR 257623) to develop long term corrective actions. The licensee took disciplinary action against several contractor employees including the

termination of the general superintendent, a mechanical supervisor, and a project manager. The test proctor resigned on February 18, 2015. The licensee made appropriate entries in the Personnel Access Data System (PADS) reflecting these decisions. The licensee also placed a hold on unescorted access for all employees who had taken tests administered by the test proctor since January 1, 2014. Those employees were subsequently retested and granted access as appropriate. In addition, the licensee conducted a culture survey involving the contractor and modified contractor management standards to reinforce proper behavior. In the fall of 2015, the licensee did not renew its contract with the contractor.

Analysis: The inspectors determined that the failure to maintain complete and accurate information via the training records of contractor employees was a performance deficiency warranting a significance evaluation. This finding is more than minor because it is associated with the Occupational Radiation Safety Cornerstone attribute of Human Performance and adversely affects the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. In addition, this issue was dispositioned using traditional enforcement due to the willful aspects of the violation. Furthermore, the failure to provide complete and accurate information has the potential to impact the NRC's ability to perform its regulatory function. Since the finding involved occupational radiation safety, the inspectors utilized IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," dated August 19, 2008, to assess its significance. The inspectors determined that the finding did not involve an overexposure; a substantial potential for an overexposure; a compromised ability to assess dose; or unplanned, unintended occupational collective dose. Consequently, the inspectors determined that the finding was of very low safety significance (Green).

The inspectors determined that the finding has a cross-cutting aspect in the area of human performance, field presence, because the licensee did not ensure management oversight of contractor work activities (H.2).

For traditional enforcement evaluation, the inspectors utilized both the Enforcement Policy and the Enforcement Manual in order to assess the severity level of the violation. Following the guidance in Part 1, Section 1.1.13, of the Enforcement Manual, the determination of the significance involving willfulness is assessed based on several factors. These factors included the position of the person involved in the violation, the regulatory responsibility imposed on the personnel involved, the significance of the underlying violation, the intent of the violator, and the economic or other advantage gained as a result of the violation. The inspectors took into consideration the fact that when licensee management learned of the testing issues through their own employee concerns program, they promptly reported the concern to the NRC and took immediate corrective actions commensurate with the significance of the issue. In addition, the violation involved the isolated actions of one low-level contract employee and did not result in any actual significant negative safety consequences. Furthermore, there have been no fitness-for-duty, radiation safety, or fire protection findings at the licensee that were determined to be the result of inadequate or compromised training. In consideration of the lack of any adverse impact from the missed refresher training, the self-reporting and corrective actions by the licensee, and the non-supervisory position of the individual test proctor, this issue

is being dispositioned as a Severity Level IV violation. The violation is being cited in the Notice because of the deliberate misconduct on the part of the test proctor.

Enforcement: Title 10 of the Code of Federal Regulations, Section 50.9 requires, in part, that information required by regulation or license condition to be maintained by the licensee shall be complete and accurate in all material respects.

10CFR26.29. (c)(2), Fitness for Duty Program - Training, states in part, licensees and other entities shall ensure that individuals who are subject to this subpart complete refresher training on a nominal 12-month frequency.

TS 5.4.1.a, "Procedures," requires in part, written procedures to be established, implemented and maintained covering the applicable procedures recommended in RG 1.33, Rev. 2, App. A, Feb. 1978. Section 7.e of App. A of RG 1.33 requires procedures for training workers in radiation protection. Licensee procedure FNP-0-AP-42, Access Control, states individuals badged as unescorted Radiation Workers must undergo annual Radiation Worker Retraining to maintain radiation controlled area (RCA) access authorization.

In addition, RG 1.33, Rev. 2, App A, Section 1.I requires procedures for a Plant Fire Protection Program. Farley Administrative procedure NMP-ES-035-007, "Fleet Fire Watch Instruction," defines hot work fire watch qualifications in Section 2.5, "Definitions," with the statement: "Note that Hot Work Fire Watch personnel are qualified by gaining and maintaining the qualification, S-FP-FIREWATCH, 'SNC Fire Watch for Hot Work/Open Flame,' which ensures the initial completion and annual retraining for S-FP-200."

Contrary to the above, on January 28, 2014, in early February 2014, and in early February 2015, the licensee maintained information that was not complete and accurate in all material respects, associated with annual requalification exams required by licensee procedures. Specifically, a contractor willfully took annual requalification examinations for two separate individuals and made inaccurate entries in training records, thereby falsely indicating that the employees actually took and passed the examinations. The records inaccurately showed that workers had successfully completed required annual requalification exams for fitness-for-duty, radiation worker, and fire watch training. The records are required to be maintained, and are material to the NRC because they are used as evidence of compliance with training requirements.

This violation is being cited due to the willful aspects of the contract employee and because the employee falsified training records and inaccurately maintained information material to the NRC. This is in accordance with the NRC's Enforcement Policy: VIO 05000348, 364/2016008-01, Inaccurate Training Records.

The underlying finding aspect of a violation is evaluated separately from the traditional enforcement violation and therefore the underlying finding is being assigned a separate tracking number (FIN 05000348,364/2016008-02, Inaccurate Training Records).

4OA6 Management Meetings

Exit Meeting Summary

On September 29, 2016, the results of this inspection were presented to C. Gayheart, Site Vice President, and other members of the licensee staff, who acknowledged the findings. No proprietary information was provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTARY INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

C. Gayheart, Site Vice President
C. Pierce, Corporate Licensing
B. Taylor, Regulatory Affairs Manager
E. Williford, Licensing Supervisor
J. Collier, Licensing
J. Wheat, Licensing

NRC

Bill Pursley, Health Physics Inspector
Jacob Panfel, Health Physics Inspector
Brian Bonser, Branch Chief
P. Niebaum, Senior Resident Inspector
K. Miller, Resident Inspector
Shane Sandal, Branch Chief

LIST OF ITEMS OPENED, CLOSED, AND REVIEWED

Opened

05000348/2016008-01	VIO	Inaccurate Training Records
05000364/2016008-01		

LIST OF DOCUMENTS REVIEWED

Procedures

NMP-TR-208, Examination and Examination Security, Version (Ver.) 5.0
NMP-TR-215, Systematic Approach to Training Implementation Phase, Ver. 6.1
NMP-ES-035, Fire Protection Program, Ver. 4.1
NMP-ES-035-007, Fleet Fire Watch Instruction, Ver. 2.1
NMP-ES-035-003, Fleet Hot Work Instruction, Ver. 6.0
FNP-0-AP-42, Access Control, Ver. 51.4

Corrective Action Reports

CAR 257623 (SNC Root Cause Analysis)

Factual Summary
OI Report Number 2-2015-032

On February 13, 2015, Southern Nuclear Company (SNC) officials reported to NRC staff that a contract test proctor for Williams Plant Services (WPS), working at the Joseph M. Farley Nuclear Plant, potentially assisted employees in passing a required annual site access exam, and may have actually taken the test for some employees. Additional information from the licensee indicated that the proctor had taken required fitness for duty and fire watch related exams as well. These incidents were reported to have occurred on separate occasions from approximately January 2014 through January 2015.

On May 7, 2015, the Nuclear Regulatory Commission's (NRC) Office of Investigations (OI) initiated an investigation and in-office review to determine, in part, whether site access, Fitness For Duty, and radiation worker required training exams had been falsified by contract personnel working at the Joseph M. Farley Nuclear Plant.

The OI investigation consisted of transcribed interviews with various WPS personnel, review of training documentation and records, and review of the licensee's investigation into the incidents. The following pertinent information and facts are provided:

On January 28, 2014, test proctor of record recorded that a WPS background screener had completed four required exams. The four exams were completed in a total of 7 minutes, 56 seconds. The background screener acknowledged in interviews with SNC corporate security in early 2015 that she did not take the exams herself. The individual also stated to corporate security that it would have been impossible for her to complete all four exams in under 8 minutes, and that it would have likely taken her 2-3 hours to complete all four exams.

In February 2014, two WPS employees received notice that they were due to complete their annual training obligations within the next month. The WPS employees stated to OI that when the test proctor of record was requested to schedule the exams, they were told afterward that there was no longer a need to take the exams. A few days later, the WPS employees received notice as having completed Fitness For Duty and radiation work training exams. The WPS employees acknowledged that they, in fact, had not taken these exams.

In early February 2015, two WPS employees met with the WPS training coordinator to complete their annual training exams. However, the individuals had trouble logging into the electronic training system, because the system showed both as having already completed the 2015 exams. Both WPS employees acknowledged that they, in fact, had not taken the exams.

OI was unable to interview the test proctor of record despite several attempts. SNC Corporate security was able to interview the test proctor of record in February 2015, during which she denied falsifying any exams on behalf of any employees.

Nonetheless, based on the results of the investigation, the NRC concluded that a WPS test proctor employee willfully took annual requalification examinations involving site access, Fitness For Duty, and radiation worker training for several WPS employees and made inaccurate entries in training records, thereby falsely indicating that the employees completed and passed the examinations.