

**Factual Summary of Nuclear Regulatory Commission Office of Investigations  
Case No. 3-2017-003**

An individual trained as a Quality Assurance (QA) technician presented paperwork for employment as a non-destructive examiner (NDE) when applying for a position requiring certain certifications. The prospective employer subsequently determined that a record of training supporting the individual's NDE qualifications was fraudulent. The prospective employer contacted the original issuer of the training records, Curtiss-Wright Nuclear Division/LMT (Curtiss-Wright), who did a simple records search and determined that they did not train the individual in question. The issue was subsequently referred to System One Holdings, LLC, (System One), who had documented the training record indicating successful training of the individual in question and used that information to issue a certification. On November 21, 2016, System One issued a notification under Title 10 of the *Code of Federal Regulations* Part 21 "Reporting of Defects and Noncompliance," alerting the industry of the falsified training record from their company for the individual in question. An Allegation Review Board was conducted in U.S. Nuclear Regulatory Commission (NRC) Headquarters on November 3, 2016, that recommended initiation of an investigation by Office of Investigations (OI) to determine if the individual had falsified his training record to obtain the certification.

OI interviewed the individual and several senior managers at System One. At the time of the interviews, Curtiss-Wright had completed their initial investigation and determined that the training document from Curtiss-Wright had been forged. During the time period that the individual was utilizing the false documents (from 2012 to 2016) he was granted unescorted access to six nuclear facilities. The individual stated that he had taken the requisite training at System One in October of 2012 but could not explain why the training indicated that it was provided by Curtiss-Wright. The document was forged by changing the name of the qualified individual. The certifying official (formerly the QA manager at System One) related that it was possible the individual received that training as described and further stated that System One's training was not of a very high quality.

The normal System One protocol at the time required a Personal Training Record Inquiry Form (for personnel who had received their training elsewhere), a System One Certificate of Qualification stating that the individual is certified to perform visual examinations, and the training record from the original source, in this case purported to be Curtiss-Wright. The former QA manager signed both the inquiry form and the certificate of qualification with a note on the inquiry form that the training instructor on the original training record was contacted. When interviewed, the former QA manager indicated that he signed the first two documents and wrote the note about the call but did not know if he made the call or if someone else on his staff validated the training. When questioned by OI during the investigation, the trainer from Curtiss-Wright insisted that no one from System One contacted him and he additionally verified that the individual did not take the class listed on the record. A handwriting expert hired by System One and the NRC concluded that the former QA Manager wrote the individual's name on the original training record, creating the forgery. OI attempted to corroborate System One's expert by having the document inspected by a forensic document analyst at the U.S. Postal Service. That review was inconclusive, but determined that it was possible that the former QA Manager had forged the documents.

OI concluded that the former QA manager at System One deliberately falsified training documents in violation of NRC regulations.