



Nuclear Safety and Quality Culture

Record Falsification Case Study: Sign on the Dotted Line

Overview

In its enforcement policy, the Nuclear Regulatory Commission (NRC) notes that “willful violations are of particular concern because the NRC’s regulatory program is based on licensees and their contractors, employees and agents acting with integrity and communicating with candor.” In simple terms, the NRC needs to be able to trust the people that are operating the facilities it licenses.

Willful misconduct is the deliberate or intentional violation of requirements or falsification of records.

The NRC recently addressed seven willful misconduct cases at nuclear facilities across the U.S. Each case involved employees who knowingly falsified official documents or records. Over the coming weeks, these incidents will be featured in a series of case studies. Employees are encouraged to discuss them in staff meetings.

The Case: Shaw AREVA Mixed Oxide Services Fuel Fabrication Facility Construction Project, South Carolina

Contrary to Engineering procedure, a senior engineer allowed a junior engineer to sign the senior engineer’s signature on 37 travelers in 2009. Travelers are documents used to verify that field and design drawings match.

Discussion

- What are some potential near-term and long-term consequences of the engineers’ actions?
- Could the junior engineer have prevented the incident? How?
- Could something similar occur at WTP? How?
- How might we prevent something similar from occurring at WTP? What key behaviors should be employed to prevent something similar from occurring at WTP?

The Consequences

Following the finding, the licensee completed an investigation, which included an extent of condition review. Subsequent corrective actions included procedural revisions, several Nuclear Safety and Quality Culture (NSQC) initiatives and the implementation of related training.

While the consequences to the employees in this specific case were not published, employees who falsify records at nuclear facilities are subject to disciplinary action, including termination. Serious offenses could lead to criminal prosecution.



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The Bottom Line

Willful misconduct can be prevented when a strong NSQC, underpinned by WTP's key behaviors, is in place. This is because discipline in execution ensures expectations and consequences are clearly stated and understood. Discipline in execution and all the key behaviors need to be continually reinforced to ensure WTP continues to strengthen its NSQC and ultimately achieves its mission. To read the WTP key behaviors, see file://wtps0356/wtphome/WEB_FILES/ProjectNews/Goals/KeyBehaviors.pdf.