



Nuclear Safety and Quality Culture

Record Falsification Case Study: We Did That, We Swear

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 other words, 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, we will examine some of these cases and encourage you to discuss them further in your staff meetings.

The Case: Watts Bar Nuclear Unit 2 Construction Project, Tennessee

In 2010, a craft foreman and craft worker falsely claimed micrometer readings for primary containment penetrations had been taken, as well as falsely attested that a work order review, field walkdown, craft documentation review and scope of work had been completed.

Discussion

- What are some potential near-term and long-term consequences of the craft employees’ actions?
- If the craft employee recognized what was being done as wrong, what could he have done? What if he did not feel comfortable raising the issue with his foreman?
- Could something similar occur at WTP? How?
- Could something similar occur in your organization? How?
- How might you prevent something similar from occurring at WTP? In your organization?
- What key behaviors should be employed to prevent something similar from occurring at WTP?

The Consequences

Corrective actions included a prompt stop to all containment electrical penetration work, an internal review, a root cause and extent of condition review, procedural revisions, targeted training, contract revisions and site and fleetwide communications.

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.