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Attorneys for Petitioners
**GREENACTION FOR HEALTH
AND ENVIRONMENTAL JUSTICE**

NUCLEAR REGULATORY COMMISSION

IN RE: TETRA TECH, EC, INC.

) **DECLARATION OF RICHARD STONEY**
) **IN SUPPORT OF PETITION TO**
) **REVOKE THE LICENSE OF TETRA**
) **TECH EC, INC.**

1
2
3 My name is Richard Stoney.
4

5 1. I have extensive experience in the radiological-control industry. I have worked in
6 the field since approximately 1983, when I began my career as a decontamination
7 ("decon") technician at the Crystal River Nuclear Power Plant in Florida. In subsequent
8 years I worked my way up from decon technician to Junior Health Physics Specialist
9 ("HP") and then Senior HP. I became a Senior HP in 1990; it took me approximately 7
10 years to gain the experience necessary to become a Senior HP.

11 2. I worked at Hunters Point Naval Shipyard ("HPNS") in San Francisco, beginning
12 on or about June 27, 2005, as a Senior HP. During my tenure at HPNS I was employed
13 by New World Environmental (NWE), a radiological-staffing company that was a
14 subcontractor to Tetra Tech EC, Inc. During that entire time, I was supervised by both
15 NWE and Tetra Tech personnel.

16 3. I left HPNS on or about March 31, 2006 to deal with the death of my father. I
17 returned to work on or about May 14, 2006. I resigned shortly thereafter, on or about
18 May 28, 2006.

19 4. I resigned because I was fed up with the work culture at HPNS and the negative
20 effect it had on the radiological work. One of the patterns and practices I confronted was
21 that there were HPs who were not properly qualified.

22 5. For example, a woman named Jane Taylor was hired as a Junior HP a couple
23 months before I left HPNS to deal with my father's death. It was common knowledge at
24 the shipyard that Taylor had no background in radiological work prior to her employment
25 at HPNS and that she falsified her resume to make it appear she had experience when, in
26 fact, she had none. I was told by another Senior HP, Susan Andrews, that Andrews had
27 seen the resume Taylor had submitted to NWE. In her resume she listed employment at a
28

1 company called "Taylor Made Construction," where she was supposedly a Senior HP for
2 a number of years. Having more than 20 years' experience in the industry, I was familiar
3 with all of the companies that did radiological-control work, and I had never heard of
4 "Taylor Made Construction." This led me to believe Taylor's resume was fraudulent.

5
6 6. Andrews also told me that after questions were raised about the truthfulness of
7 Taylor's resume, she submitted a second one. Her second resume omitted all reference to
8 "Taylor Made Construction" and the radiological experience cited in her first resume.
9 Andrews told me she had personally seen both versions of Taylor's resume as, at the
10 time, she and Taylor were roommates and Taylor's daughter had asked Andrews to print
11 out Taylor's resumes for submittal to NWE.

12 7. Taylor was hired as a Junior HP despite the widespread suspicions that her
13 resume was fraudulent. I observed Taylor's work and found her to be wholly unqualified.
14 She did not have the kind of basic familiarity with scanning equipment that a qualified
15 HP would have extensive knowledge of and experience with. I also heard from other HPs
16 that Taylor didn't know what she was doing.

17 8. Despite Taylor's lack of qualifications, she was promoted from Junior to Senior
18 HP during the brief time I was away from the shipyard. I estimate that Taylor was
19 promoted to Senior HP approximately 3-4 months after arriving at HPNS. Based on my
20 training and experience, I know it usually takes at least several years to obtain the
21 experience necessary to be qualified to be a Senior HP.

22 9. The last straw as far as I was concerned was when, on returning from my
23 bereavement leave, Taylor tried to supervise my work. She was not my supervisor, she
24 was unqualified to be an HP, let alone a supervising one, and I had been a Senior HP for
25 about 15 years while Taylor has been a Senior for a matter of weeks. There was no way
26 Taylor could supervise me. Rather than work at a place where unqualified HPs like
27 Taylor were given positions of responsibility, I resigned on or about March 28, 2006.
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10. Taylor wasn't the only Senior HP who was unqualified. Tetra Tech also employed HP supervisors who were inexperienced. These included Justin Hubbard and ~~Steve Rolfe~~.
They did not have the kind of deep knowledge and experience necessary to be supervisors.

RPD
06/15/2017

11. Unqualified Senior HPs and supervisors characterized the work culture of Tetra Tech at HPNS. It was a culture where people were promoted beyond their training and experience because they belonged to a clique of people who got preferential treatment and because they would do what they were told rather than raise questions about improper radiological practices.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Moorestown, North Carolina on 06/13/2017.



Richard Stoney