Message

From: LEE, LILY [LEE.LILY@EPA.GOV]
Sent: 2/14/2018 11:33:15 PM
To: Chesnutt, John [Chesnutt.John@epa.gov]; Yogi, David [Yogi.David@epa.gov]; Lane, Jackie [Lane.Jackie@epa.gov]
Subject: FW: Supplemental Filing No. 2 to Petition to Revoke Tetra Tech's License
Attachments: NRC Petition Supplemental Filing #2 Parcels C and E.pdf

---

From: Steven Castleman [mailto:scastleman@ggu.edu]
Sent: Wednesday, February 14, 2018 10:35 AM
To: Hearing.Docket@nrc.gov
Cc: bradley@greenaction.org; Brian Butler <brian@greenaction.org>; David Anton <davidantonlaw@gmail.com>; derek.j.robinson1@navy.ml; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; LEE, LILY <LEE.LILY@EPA.GOV>
Subject: Supplemental Filing No. 2 to Petition to Revoke Tetra Tech's License

To the NRC Executive Director for Operations:

Attached please find Petitioner's second Supplemental Filing in support of its 10 C.F.R. Section 2.206 Petition to Revoke Tetra Tech Ec, Inc.'s Materials License, No. 29-31396-01.

This second Supplemental Filing contains additional grounds for revoking Tetra Tech's license. Specifically, the filing contains additional facts demonstrating that fraud in the sampling, scanning and remediation of radiation in Parcels C and E at the Hunters Point Naval Shipyard in San Francisco, California, was much more widespread than known at the time the Petition was filed.

The second Supplemental Filing is supported by 2 Exhibits which are attached. Exhibit 1 is a report entitled, *Draft Radiological Data Evaluation Findings Report for Parcel C Soil*, dated November 2017. Exhibit 2 is a report entitled *Draft Radiological Data Evaluation Findings Report for Parcel E Soil*, dated December 2017.

Please contact me if you have any questions about our Petition or Supplemental Filings.

Steve Castleman
Visiting Associate Professor & Staff Attorney
Environmental Law and Justice Clinic
415-442-6675 | scastleman@ggu.edu

GOLDEN GATE UNIVERSITY SCHOOL OF LAW
536 Mission Street • San Francisco • CA 94105

WARNING: This E-mail, and any attachments, are covered by the Electronic Communications Privacy Act, 18 U.S.C. §2510-2521. This email may contain confidential and legally privileged information. The contents of this e-mail, and any attachments, are intended solely for the use of the person or entity to whom the e-mail was addressed. This email may also contain information that may be protected by the attorney-client privilege, work-product doctrine, or other privileges, and may be restricted from disclosure by applicable Federal and State laws. If you are not the intended recipient of this email **you are advised that any dissemination, distribution, or use of the contents of this message is strictly prohibited**.

If you received this e-mail message in error, please contact the sender by reply e-mail or phone. Please also permanently delete all copies of the original e-mail and any attachments.