

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	
<b>v.</b>	)	<b>1:11-cr- 26</b>
	)	
	)	<b>Judge Collier/Lee</b>
<b>MATTHEW DAVID CORRELL</b>	)	

**INDICTMENT**

**COUNTS ONE AND TWO**

THE GRAND JURY CHARGES THAT:

**A. AT ALL TIMES MATERIAL TO THE INDICTMENT**

1. Bechtel Power Corporation ("Bechtel") had a direct contract with the Tennessee Valley Authority ("TVA"), an agency of the United States, to construct a nuclear power plant known as Unit 2. This contract was subject to federal regulations and supervision. Bechtel had the authority to subcontract portions of the contract.

2. Bechtel sub-contracted a portion of the contract to Williams Specialty Services. The sub-contract between Williams Specialty Services and Bechtel was subject to federal regulations and supervision.

3. MATTHEW DAVID CORRELL was employed by Williams Specialty Services as an electrician.

4. MATTHEW DAVID CORRELL was assigned to a crew tasked with measuring the diameter of cables using a micrometer. The cables were designed to provide electric power to operate equipment, including safety systems, in the nuclear reactor containment structure at Unit 2.

5. It was part of MATTHEW DAVID CORRELL's responsibilities to accurately document that he had inspected and measured the cables. It was further a part of CORRELL's

responsibilities to complete form MAI-3.3-24 regarding the measurements and inspections, such forms being required and maintained by TVA.

B. THE FALSE STATEMENTS:

On or about the following dates, in the Eastern District of Tennessee, in a matter within the jurisdiction of the Tennessee Valley Authority, an agency of the United States, the defendant, MATTHEW DAVID CORRELL, did knowingly and willfully make and cause to be made, and use and cause to be used, a false writing and document, knowing the same to contain a materially false, fictitious and fraudulent statement, that is, the defendant completed and submitted reports of micrometer readings of cables, forms MAI-3.3-24, identified by cable numbers listed below, falsely indicating that the cables had been measured and inspected, whereas, in truth and in fact, such cables had not been measured and inspected:

Count	In or about	Cable Number
One	August, 2010	2PL4753A
Two	August, 2010	2V8773B

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

/s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

WILLIAM C. KILLIAN  
UNITED STATES ATTORNEY

By: /s/ James T. Brooks  
James T. Brooks,  
Assistant U.S. Attorney