5/24

Son Ninh

∴ Acting BC

- described the scenario -
- told [redacted] / E-mail.

- Notify licensee

→ Son-Ninh → Took to ARB - failed to Anne →

→ Decided to bring to OI at ARB.

→ OI asked is this first time they violated this requirement.

OI declines → agreed may be a violation of NRC requirements → First time - not intentional. Not going to review. Also based on his experience w/ RIV.

[redacted] informed licensee -

Licensee reluctant to initiate CR.

Lic Didn't believe that ~~[illegible]~~ supp - violated requirement.
Licensee didn't have the same opin.

Independent investigation : ∴ C/27

OI declaration → not deliberate. No pattern

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 6
FOIA- 2002-3601

Can violate NRC requirements w/o it being deliberate.

Willful violation → was decided that

→

Report came in w/NOV → Basis —
because
He had to prompt them —
W/Randy: though they denied violation
- they did CA
- reiterate regulatory requirem

Sm initiate CA
Fix problem —

Enforcement Manual —
- Reviewed criteria for NOV —

Randy/Sam/Carolyn Evers reviewed w/ policy open

Willfulness → call based on OI declining.

Is it OK to announce Steve's presence —

? He recalls OI deciding not willful at ARB

Sm claimed [redacted] wanted to cite the because they

→ ~~Overlook [redacted] on~~

Oversight → not to include originals in ABars.