

February 7, 2005

MEMORANDUM TO: Stuart A. Richards, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Nader L. Mamish, Director */RA/*
Emergency Preparedness Directorate
Division of Preparedness and Response
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SUBJECT: DAVIS-BESSE LESSONS LEARNED TASK FORCE REVIEW OF
DELETED EMERGENCY PREPAREDNESS INSPECTION
PROCEDURES

My staff has completed its review of the five Emergency Preparedness (EP) inspection procedures which were deleted in Change Notice 01-017 (Davis-Besse Lessons Learned Task Force Item No. 3.3.4.7), dated September 9, 2001, to determine if any deleted inspection requirements should be reconsidered for addition to the baseline inspection (BI) program. The following procedures were reviewed:

- C IP 82201, "Emergency Detection and Classification"
- C IP 82202, "Protective Action Decision Making"
- C IP 82203, "Notifications and Communications"
- C IP 82205, "Shift Staffing and Augmentation"
- C IP 82206, "Knowledge and Performance of Duties"

As a result of the review, we recommend two items for inclusion in the baseline inspection program which will add negligible hours (i.e., less than one hour) to the BI procedures. The two items are:

1. Change the wording in IP 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes," Section 03.01, to include a verification of the licensee's annual EAL review with offsite agencies (from IP 82201 Section 02.02).
2. Change the wording in IP 71114, Attachment 01, "Exercise Evaluation," Section 03.01, to include a review of the Emergency Plan and implementing procedures to ensure they contain criteria concerning protective actions for nonessential onsite personnel (from IP 82202, Section 02.03).

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The review details are included as an attachment to this memorandum. If you have any further questions concerning this review, please call Mr. Robert Kahler of my staff (301-415-2992).

Attachment: As stated

The objective of the Reactor Oversight Process (ROP) emergency preparedness (EP) inspection procedures is to gather information to determine, in conjunction with the performance indicators, whether a licensee is meeting the Cornerstone Objective and Performance Expectation. The Cornerstone Objective is:

To ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.

The Cornerstone Performance Expectation is:

Demonstration that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.

The ROP baseline inspection requirements are completed through the accomplishment of the following inspection procedures (attachments to IP 71114, "Reactor Safety-Emergency Preparedness"):

- a. Exercise Evaluation (Attachment 01)
- b. Alert and Notification System Testing (Attachment 02)
- c. Emergency Response Organization Augmentation (Attachment 03)
- d. Emergency Action Level and Emergency Plan Changes (Attachment 04)
- e. Correction of Emergency Preparedness Weaknesses and Deficiencies (Attachment 05)
- f. Drill Evaluation (Attachment 06)

The EP performance indicators (PIs) are as follows

- a. The "Drill/Exercise Performance" (DEP) PI monitors licensee performance of event classification, offsite authority notification and protective action recommendation development.
- b. The "Emergency Response Organization Drill Participation" (ERO) PI monitors licensee efforts to develop and maintain key skills within the emergency response organization through participation in proficiency enhancing evolutions, such as drills.
- c. The "Alert and Notification System Reliability" (ANS) PI monitors reliability of the alert and notification system. This system has been identified as the most risk-significant equipment system maintained by nuclear plant emergency preparedness programs.

PI verification (IP 71151) is performed annually, either in conjunction with Att 01, or when the EP program inspection is performed (Atts 02, 03, and 05).

ATTACHMENT

There are many areas important to Emergency Plan implementation, but the ones deemed most risk-significant are:

- a. Timely and accurate classification of events. This includes the recognition of events as potentially exceeding emergency action levels. [10 CFR 50.47 (b) (4)]
- b. Timely and accurate notification of offsite governmental authorities. This includes adequate performance of notifications to state and local authorities as specified in the Plan. [10 CFR 50.47 (b) (5)]
- c. Timely and accurate development of protective action recommendations for offsite authorities. This includes providing protective action recommendations (PARs) to governmental authorities, and the decision-making process to develop the PARs. [10 CFR 50.47 (b) (10)]
- d. Assessment of offsite consequences. This includes the ability to assess and monitor the magnitude and dose consequences of potential or actual radioactive releases. [10 CFR 50.47(b)(9)]

In general, NRC oversight in EP is focused on these most risk-significant areas and inspection resources are deployed in a manner to cover these areas.

The reviewer performed this review to determine if any of the inspection requirements contained in the following deleted inspection procedures should be reconsidered for addition to the baseline inspection program:

- a. IP 82201, Emergency Detection and Classification
- b. IP 82202, Protective Action Decision Making
- c. IP 82203, Notifications and Communications
- d. IP 82205, Shift Staffing and Augmentation
- e. IP 82206, Knowledge and Performance of Duties (Training)

The reviewer's response immediately follows each IP inspection requirement, followed by any change recommendations in bold.

1. IP 82201, Emergency Detection and Classification

82201-02 INSPECTION REQUIREMENTS

02.01 Verify that the emergency plan implementing procedures (EPIPs) contain measurable and observable emergency action levels (EALs) based on in-plant conditions, onsite and offsite radiological monitoring results, and offsite dose projections.

This requirement was verified by initial NRC review, and is inspected at each biennial exercise using Att 01. The DEP PI measures licensee performance in event classification activities. Att 04 ensures that emergency action level (EAL) changes do not decrease the effectiveness of the emergency plan, and that the EAL scheme continues to meet the planning standards in 10 CFR

50.47(b) and the requirements of 10 CFR 50, Appendix E.

02.02 Determine whether the licensee has reviewed the EALs with State and local authorities as required.

Att 04, Section 03.01, directs the inspector to verify that the licensee has discussed and obtained agreement on revised EALs with state and local governmental authorities. Based on recent rule-making this is no longer a requirement, and will be removed. This procedure does not ensure that EALs are reviewed with offsite agencies annually.

Recommendation: Change the wording in Att 04, Section 03.01, to direct the inspector to verify that the licensee has performed an annual EAL review with offsite agencies. One for one substitution of these verifications will result in no net increase in inspection hours.

02.03 Determine whether the emergency event classifications in the EIPs are consistent with those in the emergency plan, meet regulatory requirements, and that the classification procedure(s) has provisions for prompt and correct classifications by the licensee.

Att 04, Section 03.01.b, directs the inspector to determine that the EIPs and the Emergency Plan EAL scheme are consistent. Section 03.01 also has the inspector verify that EAL changes do not decrease the effectiveness of the Plan, and that the EALs continue to meet the standards of 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in classification of events and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of event classifications. These two activities ensure that licensee classification procedures provide for prompt and correct event classifications.

02.04 Verify that there is an individual on site at all times who has the authority and responsibility to immediately and unilaterally classify events and initiate any emergency actions, including recommending protective measures to offsite officials.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in classification of events and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of event classifications. The ERO PI provides an indication of licensee personnel participation in drills, exercises, and training evolutions. The DEP and ERO PIs are linked in that ERO drill participation is only credited when performance is assessed for contribution to DEP. Therefore, all personnel responsible for event classification and protective action decision-making must perform these activities to get credit for ERO participation. These personnel are generally licensed senior reactor operators and senior licensee managers who are clearly identified as having responsibility for these risk-significant activities. Therefore, inspectors can verify that they have performed the activities and have reasonable assurance that they can do so in an emergency.

02.05 Determine whether the licensee has adequate procedures to direct the user to classify

emergencies.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in classification of events and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of event classifications. These two activities provide performance-based indications of whether licensee procedures adequately direct decision-makers to classify emergencies.

02.06 Verify that the licensee's EALs are consistent in range, units, and conversion factors with appropriate control room instrumentation and that the decisional aids used for event classification in the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF) are readily available and consistent with the EALs.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in classification of events and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of event classifications. These two activities provide ample opportunities to verify that licensee EALs are consistent in range, units, and conversion factors with appropriate control room instrumentation, and that decisional aids used for event classification are readily available and consistent with the EALs.

2. IP 82202, Protective Action Decision Making

82202-02 INSPECTION REQUIREMENTS

02.01 Verify that the authorities and responsibilities assigned by the licensee to assess the accident and to make recommendations for protective actions are clearly reflected in the emergency plan implementing procedures (EIPs) and are consistent with the emergency plan.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in protective action recommendation (PAR) development and assessment activities, and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of PAR development and communication of PARs to offsite authorities. As such, these two activities would serve to verify that licensee authorities and responsibilities for accident assessment and PAR development have been clearly delineated in the EIPs, which are consistent with the Plan.

02.02 Determine that the criteria and methodology for making offsite protective action decisions are clearly reflected in the implementing procedures.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in protective action recommendation (PAR) development and assessment activities, and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of PAR development and communication of PARs to offsite authorities. These two activities would provide the inspector ample opportunity to determine that PAR criteria and methodology are clearly reflected in the EIPs.

02.03 Verify that the implementing procedures contain criteria concerning protective actions

for nonessential onsite personnel.

Att 01, Section 03.01 directs the inspector to observe all classification, notification, and PAR development activities. Inspectors are also instructed to review the Plan and EIPs that provide implementation instructions for classification, notification, PAR development and assessment activities. The focus of preparation for the biennial exercise is on PAR development for protecting offsite personnel, and does not specifically direct inspectors to verify that EIPs contain protective action criteria for nonessential onsite personnel.

Recommendation: Change the wording to Att 01, Section 03.01, paragraph five, line one, so that it reads “Review the Emergency Plan and EIPs that provide implementation instructions for classification, notification, PAR development, including protective actions for nonessential onsite personnel, and assessment activities.” This would call the inspector’s attention to this specific area for observation during the biennial exercise, with negligible increase in inspection hours.

02.04 Determine that the licensee has the capability to deliver timely protective action recommendations to the appropriate offsite authorities.

Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in protective action recommendation (PAR) development and assessment activities, and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of PAR development and communication of PARs to offsite authorities. These two activities would serve to verify that the licensee has the capability to deliver timely PARs to offsite authorities.

3. IP 82203, Notifications and Communications

82203-02 INSPECTION REQUIREMENTS

02.01 Determine whether licensee's notification procedures are consistent with the emergency classification and action level scheme and that they contain provisions for message verification.

The focus of Att 01, “Exercise Evaluation,” is to evaluate the licensee critique of Emergency Response Organization performance, with emphasis placed on risk-significant activities such as notification of emergencies. Att 01, Section 03.01 directs the inspector to observe all classification, notification, and PAR development activities. Inspectors are also instructed to review the Plan and EIPs that provide implementation instructions for classification, notification, PAR development and assessment activities. Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in notification activities, and identify any apparent weaknesses and deficiencies.

The DEP PI measures licensee performance in the risk-significant activity of performing offsite notifications. The Att 01 inspection activities and DEP PI verification would serve to verify that the licensee’s notification procedures are consistent with the emergency classification and action level scheme and that they contain provisions for message verification.

02.02 Determine whether procedures for alerting, notifying, and activating emergency

response personnel address criteria for alerting and activating the appropriate personnel and organizations and that the procedures are current and complete.

IP 71114, Section 03 prescribes the prioritization of additional areas for inspection beyond the risk-significant areas. Area c. is the timely activation of facilities, which is observed during every biennial exercise, since the exercise always involves the more serious emergency classes.

Att 03 Section 03.01, directs the inspector to review the Plan to determine the approved commitment for ERO activation and associated facility activation goals. The inspector must then determine whether the ERO augmentation system supports facility activation goals. Section 03.02 directs the inspector to review the results of ERO augmentation drills, determine whether the results have been evaluated accurately, and verify that drill problems have been entered into the licensee corrective action system for final corrective action.

Lastly, the ERO PI monitors licensee efforts to develop and maintain ERO skills through participation in performance-enhancing evolutions. This PI and the inspection activities provide ample opportunities to determine whether procedures for alerting, notifying, and activating emergency response personnel are current, complete, and adequate.

02.03 Verify that the content of initial and follow-up emergency messages to offsite authorities is adequate with regard to data and information requirements.

The focus of Att 01 is to evaluate the licensee critique of ERO performance, with emphasis placed on risk-significant activities such as notification of emergencies. Att 01, Section 03.01 directs the inspector to observe all classification, notification, and PAR development activities. Inspectors are also instructed to review the Plan and EIPs that provide implementation instructions for classification, notification, PAR development and assessment activities. Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in notification activities, and identify any apparent weaknesses and deficiencies.

The DEP PI measures licensee performance in the risk-significant activity of performing offsite notifications. The inspection activities of Att 01, and DEP PI verification would serve to verify that the content of initial and follow-up emergency messages to offsite authorities is adequate with regard to data and information requirements.

02.04 Verify that the prompt notification system (including provisions for prompt instructions to the public within the EPZ) is operable and is maintained.

Att 02, Section 03.02 directs the inspector to review the siren system testing record to ensure compliance with site procedures. If possible, the inspector should observe an actual siren test to verify that it is conducted in accordance with licensee procedures. Att 02 also directs the review of identified siren problems, if any, and their adequate resolution.

The ANS PI monitors the reliability of the Alert and Notification system, i.e., its performance when called on to perform its notification function.

These activities and the PI verify that the ANS system is operable and being maintained.

02.05 Verify that the communications equipment and procedures exist in the control room and licensee's emergency response facilities and are consistent with the needs for communication within the licensee's organization, for offsite support, and with State and local authorities as required.

The focus of Att 01 is to evaluate the licensee critique of ERO performance, with emphasis placed on risk-significant activities such as classification, notification, and PAR development. Att 01, Section 03.01 directs the inspector to observe all classification, notification, and PAR development activities. Inspectors are also instructed to review the Plan and EIPs that provide implementation instructions for classification, notification, PAR development and assessment activities. Att 01 Section 03.03, directs the inspector to develop independent observations of licensee performance in notification activities, and identify any apparent weaknesses and deficiencies. The DEP PI measures licensee performance in the risk-significant activity of performing offsite notifications. These activities would serve to verify that communications equipment and procedures exist for communication with State and local authorities.

Att 03 Section 03.01, directs the inspector to review the Plan to determine the approved commitment for ERO activation and associated facility activation goals. The inspector must then determine whether the ERO augmentation system supports facility activation goals. Section 03.02 directs the inspector to review the results of ERO augmentation drills, determine whether the results have been evaluated accurately, and verify that drill problems have been entered into the licensee corrective action system for final corrective action. Lastly, the ERO PI monitors licensee efforts to develop and maintain ERO skills through participation in performance-enhancing evolutions. This PI and the inspection activities provide ample opportunities to determine whether communications equipment and procedures for alerting, notifying, and activating emergency response personnel are current, complete, and adequate.

Att 01, Section 03.02, directs the inspectors to check emergency response facilities and equipment for readiness while observing use during the biennial exercise. Inspectors also review the previous two biennial inspection reports and licensee critiques to understand previously identified corrective actions. They then select a sample of ERO performance and equipment-related weaknesses for inspection during the exercise.

These combined activities are sufficient to verify that the communications equipment and procedures exist in the control room and licensee's emergency response facilities and are consistent with the needs for communication within the licensee's organization, for offsite support, and with State and local authorities as required.

02.06 Verify that communications equipment in the control room and licensee's Emergency Response Facilities is operable and that communication drills have been conducted as required.

See 02.05 response. These activities would verify that communications equipment in the control room and emergency response facilities is operable. Although this does not verify that required communication drills have been conducted, the performance-based activities would give clear indication of any communications equipment issues, and review of previous exercise critiques would identify any negative trends and repeat issues. If these issues have not been

adequately resolved, the inspectors would document a finding in accordance with 10 CFR 50.47(b)(14) [failure to correct weaknesses], which would result in further inspection until adequate resolution is attained.

02.07 Verify that communication links onsite and with offsite officials are redundant and diverse and will continue to operate in the event of power failures.

See 02.05 response. These performance-based activities would verify that communications links are operable, redundant and diverse, but does not verify continued operations in the event of power failures. There was no inspection guidance provided in IP 82203 indicating that these issues were one-time inspection items, which have been inspected previously and need only be verified on an as-needed basis. Any weaknesses or negative trends would be noted in licensee critiques, documented in the corrective action system, and available for NRC inspection. Additionally, non-functional backup power supplies are noted in the EP significance determination process procedure as examples of findings. Therefore, these issues need not be inspected on a regular basis as part of the baseline inspection program.

4. IP 82205, Shift Staffing and Augmentation

82205-02 INSPECTION REQUIREMENTS

02.01 Verify that licensee shift staffing and augmentation goals are being met as required.

Att 03 evaluates the adequacy of the emergency response organization (ERO) augmentation system. Section 03.01 directs the inspector to review the site Emergency Plan to determine the approved shift staffing commitments and associated facility activation goals. Also, the inspector reviews staff augmentation processes against facility activation goals to determine if there is reasonable assurance that the activation goals can be met.

Att 01 evaluates licensee conduct and critique of the biennial exercise. The exercise always includes higher level classification events which requires staff augmentation and activation of emergency facilities. Therefore, the exercise is a good performance-based demonstration that augmentation goals can be met.

Lastly, the ERO PI monitors licensee efforts to develop and maintain key skills within the ERO through participation in drills and exercises. As such, the majority of ERO personnel would receive regular practice at staffing emergency facilities. This combination of inspection activities and the ERO PI would serve to verify that shift staffing and augmentation goals could be met.

02.02 Determine whether the licensee has administrative mechanisms to meet goals for shift staffing and augmentation.

Att 03, Section 03.01 directs the inspector to review the augmentation processes found in the E-Plan and implementing procedures, and then ensure that elements are in place to give reasonable assurance that facility activation goals can be met. Section 03.02 directs the inspector to review the results of augmentation drills, as well as corrective actions for problems encountered during the drills, to determine if augmentation goals can be met.

As stated above, the biennial exercise provides a good forum for licensee demonstration of the augmentation process, including procedures and the augmentation system. These inspection activities provide ample verification that licensees have adequate administrative mechanisms in place to meet staffing and augmentation goals.

02.03 Determine whether augmentation drills have been conducted as required and whether augmentation goals were met.

Att 03, Section 03.02 directs the inspector to review the results of augmentation drills, as well as corrective actions for problems encountered during the drills, to determine if augmentation goals can be met. The inspector must evaluate whether the drills were good tests of the augmentation system and were evaluated accurately by the licensee to give valid conclusions. The inspector also reviews a sample of documented problems from augmentation drills to assess corrective action effectiveness. These inspection activities are sufficient to determine the adequacy and effectiveness of augmentation drills.

5. IP 82206, Knowledge and Performance of Duties (Training)

82206-02 INSPECTION REQUIREMENTS

02.01 Determine whether a training program is implemented and maintained as required.

The DEP PI monitors licensee performance in the risk-significant activities of event classification, offsite authority notification and protective action recommendation development.

The ERO Drill Participation PI monitors licensee efforts to develop and maintain key skills within the emergency response organization through participation in proficiency enhancing evolutions, such as drills and exercises.

These two PIs, complemented by effective conduct of drills and exercises, effective assessment of performance and the effective correction of weaknesses, allows a licensee response band to be established that includes among other qualities: training quality and conduct, and personnel performance in drills and exercises. Att 01 is used to evaluate the adequacy of the licensee conduct of exercises and the critique of exercise performance. Att 05 evaluates licensee efforts to correct weaknesses and deficiencies identified during not only drills and exercises, but also actual events.

Therefore, this combination of PIs, exercise evaluation, and evaluation of the licensee's corrective action efforts, provides performance-based measures to assess the adequacy of licensee training programs. If there are repeat personnel performance errors, this may not in itself, represent a training program weakness. Inspectors must review each specific circumstance, and licensee efforts to correct the weakness, and determine the reasons for repeat problems. Any training program weaknesses should be entered into the licensee's corrective action program and corrected, and would be available for NRC inspection.

02.02 Determine whether the amount and type of training received by key emergency response personnel since the last inspection are appropriate.

See 02.01 above. These performance-based measures are adequate to determine if the amount and type of training received by key emergency response personnel are appropriate.

02.03 Determine whether key licensee personnel, especially Shift Supervisors and personnel filling the position of Emergency Coordinator or equivalent, understand their emergency authorities and responsibilities and can perform their assigned duties.

The DEP PI monitors licensee performance in the risk-significant activities of event classification, offsite authority notification and protective action recommendation development.

The ERO Drill Participation PI monitors licensee efforts to develop and maintain key skills within the emergency response organization through participation in proficiency enhancing evolutions, such as drills and exercises.

These two PIs, complemented by effective conduct of drills and exercises, effective assessment of performance and the effective correction of weaknesses, allows a licensee response band to be established that includes among other qualities: training quality and conduct, and personnel performance in drills and exercises. Att 01 is used to evaluate the adequacy of the licensee conduct of exercises and the critique of exercise performance.

Therefore, this combination of PIs and exercise evaluation provides performance-based measures for inspectors to assess whether key licensee personnel understand their emergency authorities and responsibilities, and can perform their assigned duties.

02.04 Verify whether the Shift Supervisors can effectively use post-TMI indicators for core and containment status.

The DEP PI monitors licensee performance in the risk-significant activities of event classification, offsite authority notification and protective action recommendation development.

The ERO Drill Participation PI monitors licensee efforts to develop and maintain key skills within the emergency response organization through participation in proficiency enhancing evolutions, such as drills and exercises.

Att 01 directs the inspector to develop independent observations of licensee performance in classification, notification, PAR development and assessment activities, which would require Shift Supervisors to assess core and containment status to carry out these duties.

Att 06 provides for resident inspector review of drills and training evolutions, such as operator simulator-based training, to verify an adequate licensee critique of training evolutions which contribute to the DEP/ERO PIs.

This combination of PIs and inspection activities provides adequate basis to verify that Shift Supervisors can effectively use post-TMI indicators for core and containment status.

02.05 Determine whether the Shift Supervisors (and other responsible personnel) have been trained on the licensee's EAL schemes and procedures and can classify events promptly and correctly.

See 02.04 above. The combination of PIs and inspection activities is adequate to determine whether the Shift Supervisors (and other responsible personnel) have been trained on the licensee's EAL schemes and procedures and can classify events promptly and correctly.

02.06 Determine whether the licensee's staff for the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF) can implement needed onsite protective measures and can recommend timely and appropriate offsite protective actions.

See 02.04 above and response to IP 82202 Inspection Requirements 02.01 through 02.04 documented previously. These are adequate to determine whether the licensee's control room, TSC and EOF staff can implement needed onsite protective measures and can recommend timely and appropriate offsite protective actions.

02.07 Determine whether licensee personnel involved in making offsite protective action recommendations understand the relationship between plant (including core) conditions, possible offsite consequences, and the effectiveness of protective measures.

See 02.06 above. These activities are adequate to determine whether licensee personnel involved in making offsite protective action recommendations understand the relationship between plant (including core) conditions, possible offsite consequences, and the effectiveness of protective measures.

02.08 Verify whether licensee personnel can carry out notifications correctly.

See 02.04 above and response to IP 82203 Inspection Requirements 02.01 through 02.03 documented previously. These are adequate to verify that licensee personnel can carry out notifications correctly.

The review details are included as an attachment to this memorandum. If you have any further questions concerning this review, please call Mr. Bob Kahler of my staff (301-415-2992).

Attachment: As stated

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