

September 3, 2010

MEMORANDUM TO: Stephen G. Burns  
General Counsel

R. W. Borchardt  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – SECY-10-0074 – DAVID GEISEN,  
NRC STAFF PETITION FOR REVIEW OF LBP-09-24 (AUG. 28,  
2009)

The Office of the General Counsel (OGC), in consultation with the Office of Enforcement and the Office of Investigations, should conduct a review of how related NRC enforcement actions and Department of Justice (DOJ) criminal prosecutions affect each other. As part of its review, the staff should provide an analysis of changes needed, if any, to our current policies to address the impacts of parallel civil and criminal enforcement activities, issuance of immediately effective enforcement orders in matters that DOJ is also pursuing, and the degree of knowledge required for pursuing violations against individuals for deliberate misconduct. Within 45 days, OGC should submit an information paper to the Commission, outlining the issues it plans to address and the resources required to do so.

(OGC)

(SECY Suspense:

10/18/10)

cc: Chairman Jaczko  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
CFO  
OCA  
PDR