

POLICY ISSUE NOTATION VOTE

September 20, 2012

SECY-12-0125

FOR: The Commissioners

FROM: R. W. Borchardt
Executive Director for Operations

SUBJECT: INTERIM ACTIONS TO EXECUTE COMMISSION PREEMPTION
AUTHORITY UNDER SECTION 161A OF THE ATOMIC ENERGY ACT
OF 1954, AS AMENDED

PURPOSE:

This paper responds to Commission direction provided in Staff Requirements Memorandum (SRM) - SECY-12-0027, "Preemption Authority Pursuant to Section 161A., 'Use of Firearms by Security Personnel,' of the Atomic Energy Act of 1954, as amended," dated May 3, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12124A377). The paper requests Commission approval of two draft orders and a staff proposed interim process to implement, prior to promulgation of the final enhanced weapons rule, the Commission's authority under Section 161A of the Atomic Energy Act (AEA) of 1954, as amended (42 U.S.C. 2201a), to permit the security personnel of designated U.S. Nuclear Regulatory Commission (NRC) licensees to possess and use firearms, ammunition, and other devices such as large-capacity ammunition feeding devices, notwithstanding local, State, and certain Federal firearms laws that may prohibit such possession and use.

SUMMARY:

This paper outlines a process by which the Commission could execute its authority under Section 161A ("Section 161A preemption authority"). In the SRM to SECY-12-0027, the

CONTACT: Dennis Gordon, NSIR/DSP
(301) 415-6671

Commission directed the staff to: (1) provide a draft order that designates, before the promulgation of the final enhanced weapons rule, all nuclear power reactors and all Category-I special nuclear material (CAT-I SNM) facilities as the interim class of NRC-licensed facilities eligible to apply to the Commission for permission to use Section 161A preemption authority consistent with the proposed enhanced weapons rule; (2) provide an option to include specifically licensed co-located independent spent fuel storage installations (ISFSIs) in this designation; and (3) establish in the draft order, the application process to be used for covered entities to apply to the NRC for Section 161A preemption authority to include the requirements for conducting firearms background checks in accordance with Section 161A(c).

The Commission further directed the staff to provide, for Commission review and approval, draft confirmatory orders that designate individual licensees as receiving Commission authorization to use Section 161A preemption authority and establish all requirements necessary for the applicant to use and maintain this authorization. SRM-SECY-12-0027 also requires the staff to submit its recommendations on individual applications for Commission consideration as well as the staff's technical evaluation for those applications that it recommends the Commission approve. These draft confirmatory orders should include all requirements necessary to implement the Section 161A preemption authority granted to the applicant by the Commission.

Consistent with the direction provided in SRM-SECY-12-0027, the staff is submitting for Commission approval two draft orders that could implement the Commission's authority under Section 161A. The first draft order (Enclosure 1) designates the class of NRC-licensed facilities eligible to apply for and receive Commission authorization to use the preemption authority granted under Section 161A. Additionally, this draft designation order would: (1) require that all armed personnel at all facilities within the designated class of facilities be subject to a firearms background check; (2) establish requirements for the conduct of firearms background checks; and (3) provide licensees with the process for preparation and submittal of applications to the NRC for Commission authorization to use the preemption authority granted under Section 161A. The second draft order (Enclosure 2) serves as a template for the type of confirmatory order the Commission could issue when it determines that an applicant should be granted Section 161A preemption authority. This second draft order also sets forth the conditions and requirements that an applicant must meet when exercising the authorization granted to it by the Commission under Section 161A.

This paper also provides an additional option for Commission consideration. The staff is recommending that the Commission designate only a limited number of specific facilities as the class of facilities eligible to apply for Commission authorization to use the preemption authority granted under Section 161A. This option is presented as an alternative to the Commission direction in SRM-SECY-12-0027 that the staff develop a draft order designating all power reactor facilities and all CAT-I SNM facilities as the interim class of facilities for which licensees and certificate holders are eligible to apply for Commission authorization to use Section 161A preemption authority. The basis for offering this option is addressed in more detail in the Discussion section below.

This paper responds to the direction provided by SRM-SECY-12-0027 related to the Commission's execution of its authority under Section 161A through the issuance of orders. Remaining issues raised in SRM-SECY-12-0027 related to the enhanced weapons rulemaking effort are addressed separately by the responsible rulemaking staff. Resource and schedule issues associated with the rulemaking are currently before the Commission in SECY-12-0104.

BACKGROUND:

The provisions of Section 161A became effective on September 11, 2009, with the publication in the *Federal Register* (FR) of the guidelines approved by the NRC and the U.S. Attorney General entitled, "Guidelines on the Use of Firearms by Security Personnel in Protecting U.S. NRC-Regulated Facilities, Radioactive Material, and Other Property," (74 FR 46800) ("Firearms Guidelines"). The Firearms Guidelines state that the Commission will promulgate regulations or issue orders authorizing specific classes of NRC licensees and certificate holders to apply to the Commission to use the authority of Section 161A. However, the Firearms Guidelines do not contain any guidance on how the Commission should designate eligible classes of facilities. Additionally, the Firearms Guidelines state that the Commission will promulgate regulations or issue orders establishing a process for NRC licensees and certificate holders to apply for and obtain preemption and enhanced weapons authority under Section 161A.

On February 3, 2011, the Commission published in the *Federal Register* (76 FR 6199) a revised proposed enhanced weapons rule, entitled, "Enhanced Weapons, Firearms Background Checks, and Security Event Notifications." The proposed rule superseded a previously released proposed enhanced weapons rule published in the *Federal Register* (71 FR 62663) on October 26, 2006. The 2006 enhanced weapons rule was part of a larger proposed rule¹ entitled "Power Reactor Security Requirements."

Between April 2011 and January 2012, the NRC received four requests from NRC licensees for Commission authorization to use the preemption authority granted under Section 161A. Each of these requests described a need for Commission authorization under Section 161A to ensure, in the near term, the licensee's capability to maintain current equipment and protective strategies. As a result, in SECY-12-0027, "Preemption Authority Pursuant to Section 161A., 'Use of Firearms by Security Personnel,' of the Atomic Energy Act of 1954, as amended," dated February 17, 2012, (ADAMS Accession No. ML113130015) the staff recommended that interim actions be taken on these requests prior to the completion of the final enhanced weapons rule.

DISCUSSION:**Designation of Classes**

As required by SRM-SECY-12-0027, the staff is providing a draft designation order (Enclosure 1) that would designate, before promulgation of a final enhanced weapons rule, all nuclear power reactors and all CAT-I SNM facilities as the interim class of NRC-licensed facilities eligible to apply for Section 161A preemption authority. This order would also establish the process to be used by licensees or certificate holders of designated facilities to prepare and submit applications to the NRC for Commission authorization to use Section 161A preemption authority. This application process, including the application format and content, is delineated in Attachment 2 of Enclosure 1. The proposed application process in Attachment 2 to the designation order is consistent with the requirements in the Firearms Guidelines, the proposed enhanced weapons rule, and Draft Guide (DG)-5020, dated January 2011, entitled "Applying for Enhanced-Weapons Authority, Applying for Preemption Authority, and Performing Firearms

¹ The final Power Reactor Rulemaking entitled "Power Reactor Security Requirements Final Rule," was published separately in the *Federal Register* (74 FR 13925) on March 27, 2009.

Background Checks Under 10 CFR [Title 10 of the *Code of Federal Regulations*] Part 73” (ADAMS Accession No. ML100321956).

In accordance with Section 5 of the Firearms Guidelines, the designation order would require that all licensees or certificate holders falling within the designated class of facilities subject their armed security personnel to a firearms background check through the Federal Bureau of Investigation (FBI) fingerprint-based background check data-base and the name-based National Instant Criminal Background Check System (NICS). The firearms background check is required of all licensee and certificate holder armed security personnel within the designated class of facilities, even if a particular licensee or certificate holder within the designated class has no intention of applying for Section 161A preemption authority.²

To support the issuance of orders prior to promulgation of the enhanced weapons rule, the staff has developed an interim process for conducting firearms background checks. This interim process is consistent with the current proposed enhanced weapons rule, with one significant difference in the process for conducting firearms background checks. As required by Section 161A(c), the process for conducting a firearms background check includes both a fingerprint-based background check and a name-based check against applicable FBI databases. As part of the enhanced weapons rulemaking effort, the staff developed a proposed NRC Form 754, “Armed Security Personnel Firearms Background Check,” for use by armed security personnel to submit the required information to the NRC for the name-based, NICS check portion of the firearms background check or reinvestigation. Pursuant to its authority under the Paperwork Reduction Act, the Office of Management and Budget has declined to approve the proposed NRC Form 754 in advance of completion of the enhanced weapons rulemaking. Therefore, in the interim, the staff plans to use the FBI Form FD-258 “Fingerprint Card” to collect the information required to complete the NICS portion of the firearms background check. The FBI Form FD-258 is currently used by the NRC to collect background information for access authorization purposes under the provisions of 10 CFR 73.56, “Personnel Access Authorization Requirements for Nuclear Power Plants.” The same FBI Form FD-258 is also required to conduct the fingerprint-based portion of the firearms background check.³ The requirements for conducting the firearms background check are provided in Attachment 3 of

² In Regulatory Issue Summary 2008-10, Supplement 1, dated December 22, 2008, entitled “Notice Regarding Forthcoming Federal Firearms Background Checks” (ADAMS Accession No. ML082340897), the NRC notified the industry that the Department of Justice (DOJ) indicated that Section 161A mandates that all security personnel who have duties that require access to covered weapons and who are engaged in the protection of Commission-designated facilities, radioactive material, or other property owned or operated by an NRC licensee or certificate holder must be subject to a fingerprint-based background check by the U.S. Attorney General and a firearms background check against the FBI NICS.

³ Should the Commission designate all power reactors and CAT-I SNM facilities, this interim process will require that all individuals assigned official duties requiring the possession and use of any firearm at these designated facilities submit to the NRC’s Office of Administration (ADM) a completed hard-copy of the FD-258. The staff estimates that ADM will receive approximately 15,000 FD-258s from 67 sites beginning within 30 days after the first order is issued. Consistent with Section 161A(c), individuals not receiving a proceed response from the FBI within 180 days after issuance of the first order must be removed from armed duties, without exception or extension. After 180 days, all personnel who require access to firearms at designated facilities must successfully complete a firearms background check before being assigned armed duties.

Enclosure 1 and the requirements for maintaining the firearms background check are addressed in the Attachment of Enclosure 2.

Although the staff has concluded that all pertinent information can be obtained from a completed FD-258, staff in ADM has determined that the *electronic* FD-258 format does not provide all the information contained on the hard copy FD-258 required for processing the name-based portion of the firearms background check through the FBI NICS database. ADM is working with the FBI and knowledgeable contractor staff to update the current electronic fingerprint-card system (also known as Electronic Information Exchange system) to add the appropriate information fields as required. However, until this effort is complete, the staff has determined that the hard copy FD-258 is the most efficient, effective, and currently available method for collecting the information needed to complete the required firearms background checks in support of the issuance of orders.⁴ The staff has coordinated with the Office of the General Counsel (OGC) and the Office of Information Services to ensure that the collection of this information is consistent with the requirements of the Paperwork Reduction Act.

The proposed enhanced weapons rule would require licensees to submit a \$70.00 check for each Form-754 submitted. This administrative processing fee will be applied to all facilities designated by the Commission under the designation order (Enclosure 1), for the conduct of firearms background checks as described in this paper.

Staff-Generated Additional Option

The staff is proposing that the Commission, prior to promulgation of the enhanced weapons rule, designate a limited interim class of facilities eligible to apply for Commission authorization to use Section 161A preemption authority. The Firearms Guidelines specify that the Commission will designate the class of facilities eligible to apply to use the preemption authority granted to the Commission under Section 161A. However, the Firearms Guidelines do not define what constitutes a class. The determination of the eligible class is left to the discretion of the Commission. Furthermore, the Firearms Guidelines make clear that the Commission can designate classes of eligible facilities through promulgation of regulations or issuance of orders. While the Commission has stated its intent to designate eligible facilities and implement its authority under Section 161A through rulemaking, this does not preclude the Commission from taking interim action through the issuance of orders. The DOJ agrees that the designation of classes required by the Firearms Guidelines is left to the discretion of the Commission.

OGC is currently in discussions with the DOJ on the implementation of the firearms background check requirements in the Firearms Guidelines. OGC and the DOJ have reached agreement in principle that only the armed security personnel of licensees and certificate holders within a designated class that actually apply for Section 161A preemption authority are subject to the firearms background check requirement. OGC and the DOJ further agree that the current language in the Firearms Guidelines should be revised to reflect this understanding. The staff

⁴ The information fields required for the NICS portion of the firearms background check are provided in Attachment 3 of Enclosure 1 and the Attachment of Enclosure 2. To support the issuance of orders, personnel in ADM will physically transfer the required information from the hard copy FD-258 into the appropriate electronic formats and databases needed to transmit the information to the FBI for processing through both the fingerprint-based database and the name-based NICS database.

notes that revision of the Firearms Guidelines to reflect this understanding will require corresponding changes to the ongoing enhanced weapons rulemaking. However, the staff expects that limiting the firearms background check requirements to the armed security personnel of those licensees and certificate holders that actually apply to the Commission for Section 161A preemption authority would significantly reduce burdens on those designated licensees and certificate holders who do not intend to apply for such authority, as well as the burden on the NRC and the DOJ.

As discussed above, currently the armed security personnel of all licensees and certificate holders within the designated class of facilities are subject to a firearms background check. The staff recognizes that the firearms background check requirements may impose a burden on both the industry and NRC staff in that these background checks would be required of all in the designated class including licensees and certificate holders not requesting Section 161A preemption authority at this time. Accordingly, as an interim measure to address the specific needs of a limited number of facilities, the staff is proposing that the designation of the class of facilities eligible to apply for Section 161A preemption authority be limited to only those individual facilities that have a near-term need for interim action. Specifically, the staff is proposing for Commission consideration, that the interim class be limited to the following individual facilities: Babcock & Wilcox Nuclear Operation Group-Lynchburg; Diablo Canyon Nuclear Power Plant, Units 1 and 2; Indian Point Nuclear Generating, Units 1, 2, and 3; James A. Fitzpatrick Nuclear Power Plant; Nine Mile Point Nuclear Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and San Onofre Nuclear Generating Station, Units 2 and 3. Subsequently, if additional licensees apply for Commission authorization to use Section 161A preemption authority, the staff will reengage the Commission to gain approval for designation of a new or revised class of designated facilities.

Interim Option for Specifically Licensed Co-Located ISFSIs

SRM-SECY-12-0027 directed that the staff not include all ISFSIs within the class of designated facilities eligible to apply for Section 161A preemption authority. However, the SRM directed the staff to propose, prior to the promulgation of the final enhanced weapons rule, an interim option addressing specifically licensed co-located ISFSIs. Accordingly, this paper recommends that only those specifically licensed co-located ISFSIs with a physical protection program conducted as a support activity by a power reactor facility also designated by the Commission be included within the designated class of NRC-licensed facilities that are eligible to apply for Commission authorization to use Section 161A preemption authority. This recommendation recognizes that the same security force protecting a designated power reactor would be responsible for protecting the specifically licensed co-located ISFSI.⁵ Approval of this recommendation would ensure that armed personnel at designated power reactors would be authorized to use the same firearms at both the power reactor facility and any specifically licensed, co-located ISFSI.

Interim Process for Implementing Section 161A Preemption Authority

The staff has developed an interim six-step process to implement the Commission's authority under Section 161A regardless of which designation option the Commission adopts. If

⁵ General license ISFSIs that are co-located with designated power reactors are inclusive to the facility through their 10 CFR Part 50 license.

approved by the Commission, this process will be used until promulgation of the final enhanced weapons rule.

Step 1: The Commission-approved draft designation order (Enclosure 1) would be modified by the issuing office as needed for format and type of licensee. The final designation order would be issued to each licensee within the designated class of facilities under the signature authority of each responsible office director. This first order will designate the interim class of NRC-licensed facilities that are eligible to apply for Commission authorization to use Section 161A preemption authority. Attachment 1 of this order will identify the list of addressees.

Step 2: Attachment 2 of the designation order will provide the process to be followed by eligible licensees to voluntarily apply for Commission authorization to use the preemption authority granted under Section 161A. This attachment would outline the required format and content of applications and would require that the applications be submitted to the NRC for review and approval in accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," or 10 CFR 70.34, "Amendment of License," with a minimum 60 days for routine processing.⁶

Step 3: Attachment 3 of the designation order will require that all licensees within the designated classes of facilities begin submitting to the NRC within 30 days, a hard-copy FBI Form FD-258 "Fingerprint Card" for each armed member of the security organization who is or will be assigned official duties requiring the possession and use of any firearm. Licensees within the designated classes of facilities will complete each security officer's firearms background check within 180 days of this order being issued or remove the officer from duties requiring access to firearms. Additionally, each licensee shall notify the NRC in writing when a sufficient number of personnel have successfully completed the firearms background check to staff the security organization as required by NRC-approved security plans, to include meeting all applicable fatigue requirements.

Step 4: Upon receipt of an application for Commission authorization to use Section 161A preemption authority, the staff's approach for technical review is to use the six categories of information specified in the staff-developed internal review criteria entitled "Preemption Authority, Content of Application," (ADAMS Accession No. ML111650348), dated February 27, 2012. The staff believes that these categories of information are appropriate and necessary for it to make a determination on granting the applicant approval to use Section 161A preemption authority. These categories of information are derived from the Firearms Guidelines, the proposed enhanced weapons rule, and DG-5020.

Step 5: After the staff completes a technical review, and if the staff intends to recommend that the Commission approve an application, the staff would provide the draft confirmatory order template (Enclosure 2) to the applicant for its consent and for possible revision in accordance with the NRC's confirmatory order process. Upon receipt of the applicant's consent and proposed changes, the staff will then revise the confirmatory order, if necessary, to incorporate the applicant's site-specific information. The staff will submit a draft final confirmatory order to the Commission for review and approval, along with all associated staff technical reviews and

⁶ The current requests submitted for Section 161A preemption authority by licensees were not submitted in accordance with 10 CFR 50.90 or 10 CFR 73.34.

staff recommendations for Commission consideration. Where the staff's recommendation is to deny an application, the staff would submit only its own technical evaluation and recommendation for Commission consideration.

Step 6: If approved by the Commission, the final confirmatory order would be issued by the office director of the responsible licensing office after receipt of written notification from the licensee that a sufficient number of firearms background checks have been successfully completed. This licensee notification to the NRC is a Firearms Guidelines prerequisite to granting preemption authority. This final confirmatory order would grant the licensee Commission authorization to use Section 161A preemption authority and would specify all requirements that must be met to use and maintain Section 161A preemption authority. Specifically, the final confirmatory order will require that the licensee submit revised security plans to add language describing how Section 161A preemption authority will be implemented at its site. Security plan changes will be subject to 10 CFR 50.54(p), 10 CFR 50.90, 10 CFR 70.32(e), and 10 CFR 70.34 requirements as appropriate.

Delegation of Signature Authority

The staff recommends that the Commission delegate signature authority for the issuance of all Commission-approved final orders to the responsible office directors. The staff is providing in this SECY Paper, draft orders for Commission review and approval in accordance with SRM-SECY-12-0027. Additionally, the Commission will have the opportunity to review and approve all final orders before issuance. Therefore, the issuance of final orders will not raise policy issues that have not already been considered and approved by the Commission.

Furthermore, this recommendation is consistent with existing staff guidance contained in the Office of Enforcement, Enforcement Manual, Section 1.6.1 Delegation of Authority to the Director, Office of Federal and State Materials and Environmental Management Programs (FSME); Section 1.8.1 Delegation of Authority to the Director, Office of Nuclear Reactor Regulation (NRR); and Section 1.9.1 Delegation of Authority to the Director of Office of Nuclear Material Safety and Safeguards (NMSS) respectively:

1. The Director of FSME is authorized to sign and issue non-enforcement related orders and non-enforcement related Demands for Information (DFI) to licensees.
2. In accordance with Management Directive (MD) 9.27, "Organizations and Function, Office of Nuclear Reactor Regulation," the Director, NRR has been authorized to issue orders and DFIs. However, use of this authority is expected to be confined to actions not associated with violations.
3. In accordance with MD 9.26, "Organization and Functions, Office of Nuclear Materials Safety and Safeguards," the Director, NMSS, is authorized to issue orders and DFIs; however, use of this authority is expected to be confined to actions not associated with violations.

The above serves to illustrate that the responsible office directors are currently delegated authority to issue orders in accordance with agency policy. Delegation of signature authority will expedite the order process and consequently lessen possible schedule impacts. For these

reasons, the staff recommends that signature authority for issuing orders be delegated to the responsible office directors.

Finally, consistent with SRM-SECY-12-0027, the draft confirmatory order template (Enclosure 2) contains a statement that the confirmatory order may be modified or rescinded upon the effective date of a final enhanced weapons rule.

RECOMMENDATIONS:

The staff recommends that the Commission take the following actions.

1. Approve the staff-proposed process, to include issuing orders, to execute the Commission's authority under Section 161A.
2. Approve the staff-proposed additional option to designate only Babcock & Wilcox Nuclear Operation Group-Lynchburg; Diablo Canyon Nuclear Power Plant, Units 1 and 2; Indian Point Nuclear Generating, Units 1, 2, and 3; James A. Fitzpatrick Nuclear Power Plant; Nine Mile Point Nuclear Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and San Onofre Nuclear Generating Station, Units 2 and 3, as the interim class of NRC-licensed facilities that are eligible to apply for Commission authorization to use Section 161A preemption authority before promulgation of a final enhanced weapons rule. If approved by the Commission, this option will require that editorial changes be made to the draft designation order (Enclosure 1) to account for this limited designation. If the Commission does not accept this staff recommendation, the staff will, upon receiving Commission direction, issue an order that designates all power reactors and CAT-I SNM facilities as the interim class of NRC-licensed facilities that are eligible to apply for Commission authorization to use Section 161A preemption authority before promulgation of a final enhanced weapons rule, consistent with direction in SRM-SECY-12-0027.
3. Approve the staff-proposed option to include, as an interim class of eligible facilities, specific license co-located ISFSIs with a physical protection program conducted as a support activity by a power reactor facility that is also designated by the Commission, as recommended in 2 above.
4. Authorize the staff to provide each applicant for Section 161A preemption authority with the enclosed confirmatory order template for their consent and staff revision, if the staff intends to recommend approval of the application.
5. Delegate signature authority to the directors of appropriate licensing offices to issue the Commission-approved designation order and all subsequent Commission-approved confirmatory orders granting Section 161A preemption authority.

RESOURCE:

To process the firearms background checks for each of the two designation options presented in recommendation 2, ADM will fund this workload with fiscal year 2013 budgeted reimbursable resources from the Corporate Support Business Line.

Resources required to process the two orders addressed in this paper, as well as applications for Section 161A preemption, are already included in the Operating Reactor Business Line, the Fuel Facility Business Line, and the Spent Fuel Storage and Transportation Business Line budgets for licensing activities in fiscal year 2013. Therefore, no additional budgetary resources are requested to complete the work discussed in this paper.

COORDINATION:

The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection. OGC has reviewed this paper and has no legal objection.

/RA by Michael R. Johnson for/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. Draft Designation Order
2. Draft Confirmatory Order Template

Resources required to process the two orders addressed in this paper, as well as applications for Section 161A preemption, are already included in the Operating Reactor Business Line, the Fuel Facility Business Line, and the Spent Fuel Storage and Transportation Business Line budgets for licensing activities in fiscal year 2013. Therefore, no additional budgetary resources are requested to complete the work discussed in this paper.

COORDINATION:

The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection. OGC has reviewed this paper and has no legal objection.

/RA by Michael R. Johnson for/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. Draft Designation Order
2. Draft Confirmatory Order Template

DISTRIBUTION: W201200097/EDATS: SECY-2012-0233
RidsNsrMailCenter RidsEdoMailCenter DSP r/f

ADAMS SUBMISSION NO.: ML12164A839

OFFICE	NSIR/DSP/RSLB	TechEdit	NSIR/DSP/RSLB	NSIR/DSP/MWSB	NSIR/DSP/FCTSB	ADM/DFS/FSB
NAME	DGordon	CHsu	RFelts	SWastler	RCaldwell	DCardenas
DATE	6/18/12	6/15/12	7/9/12	7/ 12 /12	7/13 /12	7/12 /12
OFFICE	NSIR/DSP	Region I	Region II	Region IV	OIS	OE
NAME	CLui	CMiller	TReis	TVegel	MGivvines	RZimmerman
DATE	08/08/12	8/21/12	8/22/12	8/22/12	8/23/12	8/23/12
OFFICE	OCFO	FSME	NMSS	NRR	OGC	NSIR
NAME	JDyer	SWest for CCarpenter	CHaney	BBoger for ELeeds	NStAmour	JWiggins
DATE	8/29/12	8/23/12	8/30/12	8/21/12	9/ 7 /12	9 /12/12
OFFICE	EDO					
NAME	RWBorchardt (MJohnson)					
DATE	09/20/12					

OFFICIAL RECORD COPY