



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 20, 2012

Mr. Richard L. Anderson
Vice President
Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC
3277 DAEC Road
Palo, IA 52324-9785

SUBJECT: DUANE ARNOLD ENERGY CENTER – AUDIT OF THE LICENSEE’S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. ME6730)

Dear Mr. Anderson:

In Regulatory Issue Summary 2000-17, “Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff,” dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, “Guidelines for Managing NRC Commitment Changes,” contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees’ commitment management programs once every 3 years to determine whether the licensees’ programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

An audit of Duane Arnold Energy Center (DAEC) commitment management program was performed at the plant site on October 11, 2011. The NRC staff concludes, based on the audit, that (1) NEXTERA Energy Duane Arnold, LLC (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes at DAEC. The details of the audit are set forth in the enclosed audit report.

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The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3079.

Sincerely,

A handwritten signature in black ink that reads "Karl Feintuch". The signature is written in a cursive style with a large, prominent 'K' and 'F'.

Karl Feintuch, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosure:
Audit Report

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UNITED STATES
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

NEXTERA ENERGY DUANE ARNOLD, LLC

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

NEI 99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and licensing activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Duane Arnold Energy Center (DAEC) commitment management program was performed at the plant site on October 11, 2011. The audit reviewed commitments made since the previous audit on October 30 and 31, 2008, which was documented as an Audit Report dated December 18, 2008, and is publically available electronically from the Agencywide Documents Access and Management System (ADAMS) using the ADAMS Accession No. ML083460261. The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

Enclosure

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) or licensing activities (bulletins, generic letters, etc.). Also included in the population to provide the sample were commitments from the License Renewal activity. Commitments made in Licensee Event Reports or in response to Notices of Violation could be included in the sample, but the review is limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched the ADAMS for the licensee's submittals since the last audit and selected a representative sample population of regulatory commitments for verification as the scope of the audit.

The examination of license amendments yielded the following results (Except where noted the commitment, if any, was stated in the application letter):

- Zero commitments for Amendments 272, 273, 275, 276
- One commitment for Amendment 271, 274
- Two commitments for Amendment 277
- Multiple commitments to implementation milestones for Amendment 278 (cyber security application Enclosure 2 and in supplement dated September 27, 2010)

A request for additional information (RAI) was assembled for the licensee to locate documentation for regulatory commitments within the scope of the audit. That RAI was sent August 1, 2011 (ADAMS Accession No. ML11214A006).

Excluded from the scope of the audit was Amendment No. 279, issued on September 8, 2011, within the interval prior to the site visit, but after the date of the RAI. Given the other sources of potential samples, the selected sample population remained representative of the population to be managed without inclusion of Amendment No. 279. Further, Amendment No. 279 did not contain any commitments. Also, the licensing action request (LAR) that became Amendment No. 280 did not contain any commitments. However, the LAR that became Amendment No. 281, dated June 1, 2012 contained one commitment in its application letter NG-11-0117, dated May 31, 2011. Letter NG-11-0117 was used as a known open commitment, as of September, 2011.

Based on the RAI the licensee assembled a responsive set of documents for the site visit and computer network access. Qualified DAEC staff supported the audit.

The audit excluded the following types of commitments that are internal to licensee processes:

1. Commitments made on the licensee's own initiative among internal organizational components.
2. Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
3. Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Regulatory Commitment Management Process Description and Audit Results

During the period of interest for this audit NextEra Energy Duane Arnold, LLC (the licensee) applied Administrative Control Procedure (ACP) 102.2, "Action Request System," which identifies the methods and site organization tools for managing development, review, and implementation of station commitments. The licensee's Procedure ACP 114.5, "Procedure for Evaluation of NRC Commitment Changes," established the processes, guidelines, and activities the licensee uses to manage the development, review, and implementation of commitments generated from regulatory obligations and self-imposed requirements.

On May 1, 2009 the licensee deleted ACP 114.5 and adopted [FPL] Fleet Procedure PI-AA-205, dated July 31, 2008. Thus, the licensee experienced a transition between established local procedures and adopted fleet procedures. This presented the NRC auditor with an opportunity to probe the success of licensee management of its regulatory commitments as well as its success in managing changes to processes.

Under ACP 102.2 an Action Request System (ARS) database identified as "TeamTrack" was used in conjunction with other information sources to address and track regulatory commitments.

The licensee's successor database is NAMS, which performs the same function under the updated fleet procedures. Each plant in the fleet will have separately identified regulatory commitments.

The documents furnished by the licensee during the audit included summary sheets providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). Hard copies of documents were available. In addition, the audit was facilitated by the use of electronic versions of documents to be verified. The NRC reviewed the documents and summarized the selected commitment information in the attachment to this audit report.

The NRC staff's audit was intended to confirm that the licensee has documented its implementation of its regulatory commitments made to the NRC staff as part of past licensing communications, and that the commitments that had not yet been implemented or incorporated in design bases documents are captured in an effective manner for future implementation.

As discussed above, the ACP and ARS described in the licensee's procedures ACP 102.2 and ACP 114.5 and its successor PI-AA-205, provide acceptable tools for the licensee to capture and implement the NRC guidance on commitment management programs.

In its process the licensee enters the regulatory commitments made to the NRC into a database. The regulatory commitments are labeled as NRC commitments. Each commitment is numbered and described by a commitment title and brief description. A database is populated with information pertaining to the status of the commitments, implementation dates, identification of the target documents (that is, those documents that will finally capture the commitment), and relevant comments.

The licensee's staff is well trained in updating the commitments management program. The auditor verified that a sufficient number of the licensee's staff had routine access and retained the knowledge to maintain the process. Thus, there is negligible risk to process integrity due to planned personnel absences or to personnel turnover.

The NRC staff's audit of the licensee's commitment management program for DAEC did not identify any regulatory commitments that were not satisfied or not incorporated. The licensee has adequately maintained the database, and all the commitments selected for this audit were easily traceable. In case the commitment was already incorporated, the database provided an accurate status of the commitment and provided reference to the implementing document.

In its self assessment completed at the end of September, 2011, the licensee examined whether the conversion to NAMS introduced any failure to track regulatory commitments attributable to the transition to NAMS. It did not. As an observation the NRC auditor compliments the licensee on timing its self assessment to just prior to the NRC audit and addressing any risk to regulatory commitment management induced by the NAMS conversion.

To ensure that the regulatory commitments are not removed/changed in future revisions to the target documents, the licensee's process includes a database search to identify all the open and closed commitments against the document/procedure being revised, to ensure that all the closed commitments are captured. Further, the process ensures that the commitments are neither removed nor changed without management approval, in accordance with the plant procedures.

As part of the regulatory commitment process, the target document contains identifiers for edits attributable to regulatory commitments, to ensure that future writers and editors do not undo any completed regulatory commitments.

The governing procedure for managing the documents remains ACP 106.1, after adoption of NAMS. Use of ACP 106.1 provides continuity for procedure formats and accommodates adoption of FPL (the Parent Company of the licensee) style guides along with DAEC style guides. In response to NRC auditor questions probing for vulnerabilities, the licensee stated that they had not experienced any document failures assignable to incompatible style guides.

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented the regulatory commitments management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04.

The processes, as documented, appear robust to manage regulatory commitments and minimize vulnerabilities associated with document management in general, transitions to successor processes, anticipated contacts by future staff or contract writers and editors, and employment turnover of process support personnel. Further, the licensee is routinely assessing process performance and receives validating information on its ongoing success.

The attachment to this audit report contains details of the audit and a summary of the audit results.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at DAEC is contained in procedures ACP 102.2, ACP 114.5 and its successor PI-AA-205 and its secondary procedures. The primary focus of the audit was to ensure that the commitments are implemented without a change and if a change is made, it is in accordance with the approved plant procedures, and with the approval of the plant's management.

The audit also verified that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

Detailed processes are outlined by which the licensee carries out obligations under its regulatory commitments. Any changes to the commitments were processed through the ARS (TeamTrack) process before May 2010 and through NAMS thereafter. Changes to obligatory commitments are reported to the NRC in accordance with the recommendations of NEI 99-04. ARS and NAMS identify the affected commitments, their origin, original

criteria, proposed changes, and the justification for change. The commitment changes are documented in ARS forms for submittal to the NRC staff.

Five commitment changes were reviewed during the audit, from identification, through evaluation to disposition. The dispositions made of the four changes that were not reportable were as follows: Three items were changed to a deleted status; one item was left in its original form but reference to it was deleted. One commitment change (CR01621097) was identified and assessed during the audit as requiring notification to the NRC. Licensee records stated that notification was made by Letter NG-11-0201 dated June 8, 2011. This information was verified by search in ADAMS, which yielded ML111590889 as the cited document. The information in the report to the NRC was consistent with the information processed by the licensee.

The summarized results from the five items were:

Commitment Change No.	Nature of the change -- reason for change	NRC Notification, per evaluation
CA050256 COM036481 COM044056	Deleted for reasons provided on each evaluation sheet such as assurance of the action provided by procedural steps; not needed for operability; improved training programs accomplished goals of commitment.	Not required
ECP 1895 EC 156088	Commitment retained, but removed as a reference since no longer needed in the target procedure.	Not required
CR01621097	Delay scheduled testing until after planned replacement equipment is installed.	Yes -- Notification sent as NG-11-0201 dated June 8, 2011 and docketed as ML111590889, as part of Report of Facility Changes, Tests and Experiments, Fire Plan Changes, and Commitment Changes

In all cases the disposition of reviewed items reflected the evaluations. All records appeared to be complete and properly reviewed and authorized. Based on signature dates items moved through the evaluation process without undue delay. Based on the results of the on-site audit, the NRC auditor believes the licensee has implemented regulatory commitment changes appropriately, consistent with NEI 99-04.

3.0 OBSERVATIONS AND RECOMMENDATIONS

The auditor noted that the information requested to be on hand at the start of the audit was efficiently provided and well organized. Assigned licensee personnel were efficient and effective in supporting the audit. There are no observations leading to recommendations for change.

4.0 CONCLUSION

Based on the results of the audit, the NRC auditor concludes that the licensee has implemented the regulatory commitments management program effectively, and implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

S. Catron
D. Barta

Principal Contributor: K. Feintuch

Date: July 20, 2012

**Duane Arnold Energy Center
AUDIT RESULTS**

Letter Number and Date	Subject	Duane Arnold Commitment No.	Description of Commitment	Implementation Status
NG-09-0116	Commitments initiated in RAI Response Letter NG-01-0909 dated 8/16/2001, Re: Extended Power Uprate licensing action under TAC MB0543. (Licensee in 2001 was Nuclear Management Company, LLC (NMC))	(no AR#; tracked under Electronic File System EFS# 09022701)	The Supplemental Reload Licensing Report for the actual first cycle of operation at the Extended Power Uprate condition of 1912 MWt will be submitted to the NRC with the Core Operating Limits Report for that cycle.	CLOSED: 2-27-09 via submittal of NG-09-0116 (Auditor observation: This sample exercised the capability of the DAEC commitment management program to effectively preserve and carry out commitments spanning changed facility ownership, changed licensee designation, and changed commitment management software platforms. – kdf 6/22/2012)
NG-08-0239 dated 5/8/2008	Three Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	AR 346268 AR 346269 COM030104	Submit a supplemental report to the original 9-month response, for those walkdowns and evaluations completed during the 2009 refueling outage, within 90 days after the start up from the outage.	CLOSED: As described in NG-09-0327 dated 4/27/2009 (Walkdowns done as described in various Work Orders in folder AR 346268)
NG-08-0239 dated 5/8/2008	Three Month Response to NRC Generic Letter 2008-01, Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	AR 346268 AR 346269 COM030103	Complete the detailed walkdowns and evaluations of those inaccessible sections of piping of GL subject systems, not otherwise exempted, prior to startup from the next Refuel Outage (currently scheduled for early 2009).	CLOSED: As described in NG-09-0327 dated 4/27/2009 (Walkdowns done on 3/2/2009, as described in various Work Orders in folder AR 346268)
NG-08-0777 dated 10/13/2008	Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (9 month response to GL 2008-01)	AR 346276	FPLE Duane Arnold commits to submit to NRC proposed changes to TS based upon the final approved version of TSTF Traveler for unacceptable gas accumulation in ECCS, modified, as needed, within 180 days following NRC publication of the Notice of Availability of the TSTF Traveler (RE: GL 2008-01)	OPEN as of 8/31/2011 Adoption of TSTF-523 rescheduled to 12/31/2011, due to continued non-availability of TSTF-523.

NG-09-0047 dated 1/30/2009	Tech Spec Change Re: Work Hour Restrictions, which became License Amendment 274	AR 346328	Removal of the TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart 1 requirements. Completed not later than 10/1/2009	COMPLETE Amendment 274 was reviewed under TAC ME0464 and issued on 9/18/2009. ADAMS document ML053050309, the DAEC Technical Specifications, contains the amended page.
NG-10-0067 dated 2/15/2010	Decommissioning Spent Fuel Management Program	AR 346393	Provide \$52 Million if license not renewed	CLOSED: License was renewed.
NG-07-0495, dated June 11, 2007	Licensee Event Report # 2007-008-00	CAP049511	Review O-Ring procurement and quality level process. (commitment in letter of interest for 2011 audit but item closed earlier)	CLOSED: O-Ring replaced and EDG was declared operable on April 12, 2007, per LER 2007-008-00, as reported in NG-07-0495 August 27, 2007. Condition Evaluation completed.
NG-10-0559 dated 11/6/2010	Relief Request for Weld Overlay	AR 1680230	Withdrawal of commitments contained in NG-10-0559 dated 10/6/2010 (Ref 1 of NG-10-0567): 1) NextEra Energy Duane Arnold will perform an additional ultrasonic examination (UT) of the RRA-F002A weld prior to start-up from the current refuel outage (RF022) following Mechanical Stress Improvement Process (MSIP), if performed, on the adjacent RRA-F002 weld. 2) NextEra Energy Duane Arnold will perform the required UT of the RRA-F002A1RRAJ003 weld overlay during the next refuel outage (RF023), currently scheduled for fall of 2012, and this exam will include the RRA-F002 weld, if MSIP has been applied to that weld during RF022.	WITHDRAWN: AR 1680230 contains record of withdrawal using NG-10-0567 as notification (see also AR 593772)
NG-10-0601 dated 12/7/2010	Relief Request Re: PSV 4402	AR 1599991	If there is an unplanned shutdown with a drywell entry before the next refueling outage (currently scheduled to begin in October 2012), another inspection of this mechanical joint will be performed at a minimum pressure of 940 psig to look for any evidence of leakage. This commitment supersedes the commitment made in NG-10-0597 dated 12/4/2010.	COMPLETE: Relief request was authorized under TAC ME5143. WO 4006850301 was work order to inspect PSV 4402. Work was completed and approved on 8/17/2011.

NG-10-0597 dated 12/4/2010	Relief Request Re: PSV 4402	AR 1688867	If there is an unplanned shutdown with a drywell entry before the next refueling outage (currently scheduled to begin in October 2012), another inspection of this mechanical joint will be performed at a minimum pressure of approximately 940 psig to look for any evidence of leakage.	WITHDRAWN: Superseded (and thus withdrawn) by NG-10-0601 dated 12/7/2010
NG-11-0267 dated 8/15/2011	Transition to NFPA-805 Fire Protection Standard	AR 1648614	The Licensee Commitments, identified in Table S-1 and S-2 of Attachment S of the enclosed Transition Report, are proposed to support approval of the LAR. (At the time of this audit the LAR, under TAC ME6818, is in active review with the potential of additional or changed commitments).	OPEN: TAC ME6818 is in progress with a projected completion in 2013. Licensee has anticipated change by preparing a High Impact Change Management Plan (NAMS 01623193) – multiple stakeholder signoffs between 8/8 to 8/18/2011
NG-11-0117 dated 5/31/2011	Amendment Re: EAL Changes (since this regulatory commitment audit, this action has been issued as License Amendment 281 on 6/1/2012)	AR1654071	NextEra Duane Arnold commits to providing a review of the new classification scheme to State and local emergency management officials following NRC approval and prior to implementation	OPEN: As of the date of this report, closure is estimated to be on or before October 1, 2012, based on amendment issuance on June 1, 2012.
NG-07-0971 dated 12/20/07	Adoption of TSTF-475 pertaining to control rod notch testing frequency, which became License Amendment 271, dated 11/6/2008, under TAC MD7541	AR00346319	FPL [now NextEra] Energy Duane Arnold will establish the Technical Specification Bases for TS B 3.1.3 and TS B 3.1.4 consistent with those in TSTF-475, Revision 1, "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action."	COMPLETE: The commitment is as stated in NG-07-0971. The licensee identified this action internally as TSCR-098 in NG-07-0971. The serial number "098" is used as the Revision designation on the footer of the affected TS Bases pages. The changes on TS Bases pages B 3.1-17, -20, -21, -22, and -25 implement the commitment.
NG-10-0372 dated 8/12/2010	Adoption of TSTF-427, pertaining to unavailability of barriers, which became License Amendment 277, dated 2/28/2011, under TAC ME4546	AR00395480	NextEra Energy Duane Arnold commits to the guidance of NUMARC 93-01, Revision 2, Section 11, which provides guidance and details on the assessment and management of risk during maintenance. [To be implemented with the amendment]	COMPLETE: Commitment implemented on 4/29/2011 in procedure ACP 109.5, Guidelines For Operability of Barriers. Specifically, the commitment is addressed in Sections 2.0(3), 5.2, and 5.3 of the procedure.

NG-10-0372 dated 8/12/2010	Adoption of TSTF-427, pertaining to unavailability of barriers, which became License Amendment 277, dated 2/28/2011, under TAC ME4546	AR00395480	NextEra Energy Duane Arnold commits to the guidance of NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427) Industry Implementation Guidance," March 2006. [To be implemented with the amendment, when the barrier(s) are available	COMPLETE: Commitment implemented on 4/29/2011 in procedure ACP 109.5, Guidelines For Operability of Barriers. Specifically, the commitment is addressed in Sections 2.0(3), 5.2, and 5.3 of the procedure.
NG-10-0473 dated 9/27/2010	Cyber Security Plan, which became License Amendment 278, under TAC ME4287.	AR590737	Revise cyber security plan to clarify the scope of systems on or before 11/30/2010	COMPLETE: NG-10-0473 identifies the balance of plant (BOP) structures, systems and components (SSSCs) important to safety as those SSCs identified in Attachment 1 of the "Bright-Line" Survey in response to a Letter from Michael Moon (NERC*) to NextEra Energy Duane Arnold, "NERC's Response to the Completed Bright-Line Survey," dated August 27, 2010. [NERC is the North American Electric Reliability Corporation]

The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3079.

Sincerely,

/RA/

Karl Feintuch, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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