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July 3, 2014

VIA E-MAIL AND FIRST CLASS MAIL

Director  
Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-001

Re: **Docket ID NRC-2014-0111**

Dear Sir:

Regarding the Order issued in the above-referenced matter, I respectfully submit the enclosed Answer on behalf of Armando N. Clavero.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa J. Sharp", written in a cursive style.

Lisa J. Sharp

LJS:stw

cc: Mr. Armando N. Clavero

John Wray  
Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
[john.wray@nrc.gov](mailto:john.wray@nrc.gov)

Brian Newell  
Rulemakings and Adjudications Staff  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
[Hearing.Docket@nrc.gov](mailto:Hearing.Docket@nrc.gov)

### ANSWER OF ARMANDO N. CLAVERO

1. Before me, the undersigned Notary Public in and for said County and State, personally appeared Armando Clavero, who being first duly sworn, deposes and says on oath as follows:

2. My name is Armando N. Clavero. I am over the age of majority, and I have personal knowledge of the matters contained in this Answer.

3. Although the Nuclear Regulatory Commission (NRC) determined otherwise, I did not intend to cause Dr. Bradley Bastow to violate any NRC requirements, including, but not limited to, the requirements contained in 10 C.F.R. 30.9, 35.24, 35.61 and 35.67.

4. Respectfully, I did not, by my actions, my inaction, or by my direction to any individual under my control, intend to violate any NRC requirements, including the prohibitions contained in 10 C.F.R. 30.10.

5. I do have personal credit card receipts and records, which may impact the NRC's determinations related to me. I do not know if the Commission considered these records before making its findings in the investigation related to Docket ID NRC-2014-0111.

6. As I did not knowingly engage in conduct or behaviors with the intent to violate or circumvent any NRC rules or regulations, I respectfully request that the Commission reconsider its findings against me and rescind the Order of Prohibition entered on May 13, 2014.

7. Alternatively, for the foregoing reasons, I respectfully request that the Commission consider either supervised probation for the 3-year period announced in the May 13, 2014 Order, rather than a ban, or a reduction of the length of the ban to a period of time less than 3 years.

8. I am willing to take any compensatory or remedial acts and/or participate in any training or educational program(s) or course(s) as required by the Commission in

order to provide it reasonable assurance that licensed activities can be conducted in compliance with the Commission's requirements and that the health and safety of the public will be protected if I am permitted to participate in NRC-licensed activities.

9. I am not engaging in, supervising, directing, or in any other way conducting NRC-licensed activities and am not currently involved with any licensee in NRC-licensed activities.

10. Finally, I intend to fully comply with all conditions of the Commission's final determinations related to Docket ID NRC-2014-0111.

The above is true to the best of my knowledge.

Respectfully Submitted,

  
Armando N. Clavero

Date: July 3, 2014

Sworn to and subscribed before me on this the 3 day of July, 2014.



  
Notary Public  
My Commission expires: May 1, 2015