



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

February 20, 2015

Mr. Louis P. Cortopassi
Site Vice President and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
9610 Power Lane, Mail Stop FC-2-4
Blair, NE 68008

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT RE:
REVISE TECHNICAL SPECIFICATION SECTION 3.2, TABLE 3-5, TO ADD A
NEW SURVEILLANCE REQUIREMENT TO VERIFY CERTAIN VALVE
POSITIONS (TAC NO. MF4089)

Dear Mr. Cortopassi:

The U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 280 to Renewed Facility Operating License No. DPR-40 for the Fort Calhoun Station, Unit No. 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 30, 2014, as supplemented by letter dated January 27, 2015.

The amendment revises TS section 3.2, Table 3-5, for Fort Calhoun Station, Unit No. 1, to add a new surveillance requirement to verify the correct position of the valves required to restrict flow in the high pressure safety injection system.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Lyon".

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosures:

1. Amendment No. 280 to DPR-40
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
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OMAHA PUBLIC POWER DISTRICT

DOCKET NO. 50-285

FORT CALHOUN STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 280
Renewed License No. DPR-40

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Omaha Public Power District (the licensee), dated April 30, 2014, as supplemented by letter dated January 27, 2015, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Renewed Facility Operating License No. DPR-40 is amended by changes as indicated in the attachment to this license amendment, and paragraph 3.B. of Renewed Facility Operating License No. DPR-40 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 280, are hereby incorporated in the license. Omaha Public Power District shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 120 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Eric R. Oesterle, Acting Chief
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. DPR-40
and Technical Specifications

Date of Issuance: February 20, 2015

ATTACHMENT TO LICENSE AMENDMENT NO. 280
RENEWED FACILITY OPERATING LICENSE NO. DPR-40
DOCKET NO. 50-285

Replace the following pages of the Renewed Facility Operating License No. DPR-40 and the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

License Page

REMOVE

INSERT

-3-

-3-

Technical Specifications

REMOVE

INSERT

3.2 - Page 5
3.2 - Page 15

3.2 - Page 5
3.2 - Page 15

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or when associated with radioactive apparatus or components;
 - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by operation of the facility.
3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is, subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

A. Maximum Power Level

Omaha Public Power District is authorized to operate the Fort Calhoun Station, Unit 1, at steady state reactor core power levels not in excess of 1500 megawatts thermal (rate power).

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 280 are hereby incorporated in the license. Omaha Public Power District shall operate the facility in accordance with the Technical Specifications.

C. Security and Safeguards Contingency Plans

The Omaha Public Power District shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Fort Calhoun Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan," submitted by letter dated May 19, 2006.

OPPD shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The OPPD CSP was approved by License Amendment No. 266.

TECHNICAL SPECIFICATIONS

3.0 SURVEILLANCE REQUIREMENTS

3.0 SURVEILLANCE REQUIREMENTS

3.2 Equipment and Sampling Tests (continued)

Table 3-5, Item 8b verifies that primary to secondary LEAKAGE is less or equal to 150 gallons per day through any one SG. Satisfying the primary to secondary LEAKAGE limit ensures that the operational LEAKAGE performance criterion in the Steam Generator Program is met. If this surveillance requirement is not met, compliance with LCO 3.17, "Steam Generator Tube Integrity," should be evaluated. The 150 gallons per day limit is measured at room temperature as described in Reference 5. The operational LEAKAGE rate limit applies to LEAKAGE through any one SG. If it is not practical to assign the LEAKAGE to an individual SG, all the primary to secondary LEAKAGE should be conservatively assumed to be from one SG.

The Surveillance is modified by a footnote which states that the Surveillance is not required to be performed until 12 hours after establishment of steady state operation. For RCS primary to secondary LEAKAGE determination, steady state is defined as stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows.

The Surveillance Frequency of daily is a reasonable interval to trend primary to secondary LEAKAGE and recognizes the importance of early leakage detection in the prevention of accidents. The primary to secondary LEAKAGE is determined using continuous process radiation monitors or radiochemical grab sampling in accordance with the EPRI guidelines (Ref. 5).

Table 3-5, Item 25 verifies adequate measurements are taken to ensure that facility protective actions will be taken (and power operation will be terminated) in the event of high and/or low river level conditions. The high river level limit of less than 1004 feet mean sea level is based on the maximum elevation at which facility flood control measures provide protection to safety related equipment (i.e., due to restricted access/egress to the intake structure veranda once the flood barriers are installed prior to river level reaching 1004 feet msl). A continuous watch will be established at 1002 feet mean sea level to provide adequate response time for rising river levels in accordance with the abnormal operating procedure. The river level surveillance requirement specified also ensures sufficient net positive suction head is available for operating the RW pumps. The minimum river level of 976 feet 9 inches provides adequate suction to the RW pumps for cooling plant components. The surveillance frequency of "Daily" is a reasonable interval and models guidance provided in NUREG-0212, Revision 2, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," Section 4.7.6. This surveillance requirement verifies that the Missouri River water level is maintained at a level greater than or equal to 976 feet 9 inches mean sea level. A continuous watch is established to monitor the river level when the river level reaches 980 feet mean sea level to assure no sudden loss of water supply occurs.

Table 3-5, Item 26 verifies the proper position of stops on high pressure safety injection system valves. The valves have stops to position them properly so that flow is restricted to a ruptured cold leg, ensuring that the other cold legs receive at least the required minimum flow. The refueling frequency is based on the need to perform these Surveillances under the conditions that apply during a plant outage and the potential for unplanned transients if the Surveillance were performed with the reactor at power.

References

- 1) USAR, Section 9.10
- 2) ASTM D4057, ASTM D975, ASTM D4176, ASTM D2622, ASTM D287, ASTM 6217, ASTM D2709
- 3) ASTM D975, Table 1
- 4) Regulatory Guide 1.137
- 5) EPRI, "Pressurized Water Reactor Primary-to-Secondary Leak Guidelines."

TECHNICAL SPECIFICATIONS

**TABLE 3-5
MINIMUM FREQUENCIES FOR EQUIPMENT TESTS**

	<u>Test</u>	<u>Frequency</u>	<u>USAR Section Reference</u>
25.	River Level	Verify water level is within limits by measurement at least once per 24 hours, when the water level is less than 1004 feet and greater than or equal to 976 feet 9 inches above mean sea levels.	D 9.8
26.	HPSI Throttle Valves	Verify, for each HPSI throttle valve listed below, each position stop is in the correct position.	R
	HCV-311	HCV-312	
	HCV-314	HCV-315	
	HCV-317	HCV-318	
	HCV-320	HCV-321	

¹ The provisions of Technical Specification 3.0.1 and 3.0.5 do not apply.

² Whenever the system is at or above operating temperature and pressure.

³ Not applicable to primary to secondary LEAKAGE.

⁴ Verify primary to secondary LEAKAGE is ≤ 150 gallons per day through any one SG. This surveillance is not required to be performed until 12 hours after establishment of steady state operation.

⁵ Tests shall be performed in accordance with applicable section(s) of ANSI N510-1980.



UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 280 TO RENEWED FACILITY

OPERATING LICENSE NO. DPR-40

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

1.0 INTRODUCTION

By application dated April 30, 2014, as supplemented by letter dated January 27, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML14125A239 and ML15027A622, respectively), Omaha Public Power District (OPPD, the licensee) requested changes to the Technical Specifications (TSs; Appendix A to Renewed Facility Operating License No. DPR-40) for the Fort Calhoun Station, Unit No. 1 (FCS).

The proposed amendment would revise TS section 3.2, "Equipment and Sampling Tests," Table 3-5, "Minimum Frequencies for Equipment Tests," for FCS to add a new surveillance requirement (SR) to verify the correct position of the valves required to restrict flow in the high pressure safety injection system (HPSI).

Specifically, the licensee proposes to add a new SR, Item 26, to TS 3.2, Table 3-5. Item 26 would require, for each of the following HPSI throttle valves, verification on an 18-month frequency (R) that each position stop is in the correct position: HCV-311/HCV-312, HCV-314/HCV-315, HCV-317/HCV-318, and HCV-320/HCV-321.

The supplemental letter dated January 27, 2015, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on August 19, 2014 (79 FR 49108).

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. In Section 50.36, "Technical specifications," of Title 10 of the *Code of Federal Regulations* (10 CFR), the NRC established its regulatory requirements related to the content of TSs. Pursuant to 10 CFR 50.36, TSs are required to

include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings, (2) limiting conditions for operation, (3) SRs, (4) design features, and (5) administrative controls. The rule does not specify the particular requirements to be included in a plant's TSs. The regulations in 10 CFR 50.36(c)(3) state that

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

FCS was licensed for construction prior to the issuance of 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," but at that time committed to the draft General Design Criteria (GDC). The draft GDC are contained in Appendix G of the FCS Updated Safety Evaluation Report (USAR) and are similar to those contained in 10 CFR Part 50, Appendix A. The applicable GDCs of Appendix G of the FCS USAR to this proposed change are:

- Draft GDC 44 - Emergency Core Cooling Systems Capability, requires an emergency core cooling system (ECCS) design that meets performance criteria
- Draft GDC 45 - Inspection of Emergency Core Cooling Systems, requires an ECCS design that meets inspection requirements
- Draft GDC 46 - Testing of Emergency Core Cooling Systems Components, requires components that meeting testing requirements, and
- Draft GDC 47 - Testing of Emergency Core Cooling Systems, requires an ECCS design that meets testing requirements.

3.0 TECHNICAL EVALUATION

3.1 Proposed Changes

The licensee proposed the following addition to TS 3.2, Table 3-5:

<u>Item</u>	<u>Test</u>	<u>Frequency</u>
26. HPSI Throttle Valves	Verify, for each HPSI throttle valve listed below, each position stop is in the correct position.	R
	HCV-311	HCV-312
	HCV-314	HCV-315
	HCV-317	HCV-318
	HCV-320	HCV-321

The licensee also provided revised TS Bases for TS 3.2 to reflect Volume 2, "Bases," of NUREG-1432, "Standard Technical Specifications - Combustion Engineering Plants," Revision 4 (STS), specifically STS Bases SR 3.5.2.9.

3.2 Summary of Technical Information Provided by the Licensee

The licensee provided the following summary of Licensee Event Report (LER) 2013-003-01:¹

[...] HPSI pump operation was identified as unreliable when operated in the extended flow region of the manufacturer's pump curve during an accident. The available net positive suction head was identified as insufficient to support pump operation in the extended flow region. During system benchmark testing, it was identified that the safety injection loop flows were imbalanced. Three (3) valves were identified as having higher flow coefficients (Cv) values than specified in the original design specifications.

As a consequence, the licensee has set the HPSI discharge header isolation valve position to balance safety injection flow into the four reactor coolant system loops. Further, the licensee determined that valves in the low pressure safety injection (LPSI) flowpath do not have to be positioned to less than full-open and therefore are not included in the proposed SR.

OPPD cited a letter from the NRC to the licensee dated June 30, 1977,² which stated, in part, that:

In view of the safety function associated with the proper setting of valves used to throttle flow in these systems, we consider it appropriate that periodic verification be made of these valve positions. Accordingly, we request that you determine if throttle valves are used to obtain the required flow distribution in the HPSI or LPSI systems. If throttle valves are used, we request that you propose changes to your technical specifications to incorporate the surveillance requirements given in the enclosure.

The licensee proposed to add new SRs similar to STS to verify the correct position of the valves required to restrict flow. The valves to be verified are HCV-311/HCV-312, HPSI to Reactor Coolant Loop 1B Isolation valves, HCV-314/HCV-315, HPSI to Reactor Coolant Loop 1A Isolation valves, HCV-317/HCV-318, HPSI to Reactor Coolant Loop 2A Isolation valves, and HCV-320/HCV-321, HPSI to Reactor Coolant 2B Isolation valves. The valve positions would be verified on a refueling frequency.

3.3 NRC Staff Evaluation

The NRC staff reviewed the license amendment request (LAR) by evaluating the submitted information, and verifying that the proposed SR is appropriate. The staff also reviewed the

¹ Cortopassi, Louis P., "Licensee Event Report 2013-003, Revision 1, for the Fort Calhoun Station," dated November 27, 2013, LIC-13-0171, ADAMS Accession No. ML13333A673.

² Letter from NRC (G. Lear) to OPPD (T. E. Short) dated June 30, 1977 (NRC-77-0060).

related LER and Integrated Inspection Report, which provided additional insight into the importance of the valve position to safety.

The March 19, 2014, Integrated Inspection Report for FCS (ADAMS Accession No. ML14078A666), provides a succinct history of the HPSI valves relative to flow balancing:³

Despite the constraints of the original design, in April 1977 the licensee removed the limit switch settings from the loop injection valves in an attempt to increase HPSI injection flow. This had the unrecognized and undesirable effect of defeating the original design intent of maintaining balanced loop injection flows. The licensee's emergency procedures still contained steps that directed the operators to maintain balanced injection flows, so the net effect of this design change was to move the flow balancing design feature from an automatic design feature to a manual operator action.

In a letter dated June 30, 1977, the NRC staff notified OPPD of the safety importance of maintaining balanced loop injection flow rates from the HPSI and LPSI systems, and requested that the licensee determine if throttle valves were used in the design to achieve the required flow balance. The letter further requested that if throttle valves were used, the licensee should propose changes to the Technical Specifications to add a specific set of surveillance requirements that were included as an attachment to the NRC letter.

The licensee provided a brief response to this letter on August 22, 1977, which stated that throttle valves were not used to obtain the needed flow distribution from the HPSI or LPSI systems. The licensee failed to inform the NRC that they had originally been designed with throttled loop injection valves, but had removed this important design feature just prior to receiving the letter from the NRC. As a result, the surveillance requirements described in the June 30, 1977 letter were not added to the Fort Calhoun Station Technical Specifications.

As identified in LER 2013-003-01 and the NRC's letter dated June 1977, the proper position of valves that throttle the flow in the HPSI system is important to reliable system performance. The licensee stated in the LAR dated April 30, 2014, that the valves in the LPSI system flowpath are not required to be positioned less than full open. As such, the applicant is not proposing to add the valves in the LPSI flowpath to the SRs, consistent with the NRC's letter dated June 30, 1977. The NRC staff concludes that licensee's proposal to add the valves that are required to restrict the flow to the HPSI system, while not adding the valves that remain full-open in the LPSI system to the SRs in TS 3.2, Table 3-5, is acceptable.

OPPD is proposing the frequency for the new SR with the notation of "R." Per Section 3.0.2 of the licensee's TSs, the notation "R" is defined with the title of "Refueling" and a frequency of

³ Hay, Michael. "Fort Calhoun – NRC Integrated Inspection Report Number 05000285/2014002 and Notices of Violations," dated March 19, 2014, ADAMS Accession No. ML14078A666.

“At least once per 18 months.”⁴ This is consistent with the STS which state a frequency of “18 months or in accordance with the Surveillance Frequency Control Program”.⁵

3.4 Conclusion

The NRC staff evaluated the licensee’s proposed changes and the impact of the proposed changes to the FCS TSs. Based on the above, the NRC staff determined that the proposed changes comply with the requirements of 10 CFR 50.36(c)(3) for SRs that assure the limiting conditions for operation will be met and with requirements of the applicable draft GDCs for ECCS in Appendix G of the FCS USAR. Therefore, the proposed changes to the FCS TS 3.2, Table 3-5 are acceptable.

The regulation at 10 CFR 50.36(a)(1) states: “A summary statement of the bases or reasons for such specifications ... shall also be included in the application, but shall not become part of the technical specifications.” The licensee may make changes to the TS Bases without prior NRC staff review and approval in accordance with the TS Bases Control Program, TS 5.20. Accordingly, along with the proposed TS changes, the licensee also submitted TS Bases changes corresponding to the proposed TS changes. The NRC staff determined that TS Bases changes are consistent with the proposed TS changes and provide the purpose for each requirement in the specification consistent with the Commission’s Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors dated July 22, 1993 (58 FR 39132).

4.0 STATE CONSULTATION

In accordance with the Commission’s regulations, the Nebraska State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding published in the *Federal Register* on August 19, 2014 (79 FR 49108). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

⁴ Omaha Public Power District, Docket No. 50-285, Fort Calhoun Station, Unit 1 Renewed Facility Operating License No. DPR-40, ADAMS Accession No. ML053110488.

⁵ NUREG-1432, “Standard Technical Specifications, Combustion Engineering Plants,” Revision 4.0, Volume 1, Specifications, April 2012, ADAMS Accession No. ML12102A165.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. Saenz, NRR/DSS/SRXB

Date: February 20, 2015

February 20, 2015

Mr. Louis P. Cortopassi
Site Vice President and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
9610 Power Lane, Mail Stop FC-2-4
Blair, NE 68008

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Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosures:

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2. Safety Evaluation

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