



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

March 30, 2015

EA-15-020

Lou Cortopassi, Vice President
and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station FC-2-4
P.O. Box 550
Fort Calhoun, NE 68023-0550

**SUBJECT: FORT CALHOUN STATION – NRC LICENSED OPERATOR
REQUALIFICATION INSPECTION 05000285/2015010 AND NOTICE OF
VIOLATION**

Dear Mr. Cortopassi:

On March 5, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Fort Calhoun Station to review the circumstances surrounding your failure to provide complete and accurate information to the NRC regarding licensed operator medical examinations. The NRC inspectors discussed the results of this inspection with Mr. Sonny Dean, Plant Manager, and other members of your staff. Inspectors documented the results of this inspection in the enclosed inspection report.

The enclosed inspection report discusses a Severity Level IV violation. The NRC evaluated this violation in accordance Section 2.3.2.a of the NRC Enforcement Policy, which appears on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. Although this violation has been placed in the corrective action program, a Notice of Violation is being issued and a response is being required for the NRC to better understand: (1) the cause of the failure to perform complete medical examinations as required, (2) the extent of condition for the failure to provide complete and accurate information and for the failure to meet the applicable ANSI standard, and (3) the corrective actions taken and planned at this time to assure all information submitted to the NRC is complete and accurate in all material respects.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC's review of your response to the Notice will also determine whether further enforcement action is necessary to ensure your compliance with regulatory requirements.

If you contest the violation or significance of the NOV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC resident inspector at the Fort Calhoun Station.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/ Clyde C. Osterholtz for

Vincent G. Gaddy, Branch Chief
Operations Branch
Division of Reactor Safety

Docket No. 05000285
License No. DPR-40

Enclosures:

1. Notice of Violation
2. Inspection Report 05000285/2015010
w/Attachment: Supplemental Information

cc w/ encl: Electronic Distribution

L. Cortopassi

- 2 -

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OFFICIAL RECORD COPY

Letter to Lou Cortopassi from Vincent G. Gaddy, dated March 30, 2015

SUBJECT: FORT CALHOUN STATION – NRC LICENSED OPERATOR
REQUALIFICATION INSPECTION 05000285/2015010 AND NOTICE OF
VIOLATION

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NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket No. 50-285
License No. DPR-40
EA-15-020

During an NRC inspection completed on March 5, 2015, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the Code of Federal Regulations (10 CFR) 50.9 requires, in part, that information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

Title 10 of the Code of Federal Regulations 55.21 requires, in part, that an applicant for a license shall have a medical examination by a physician and the licensee shall have a medical examination by a physician every two years. The physician shall determine that the applicant or licensee meets requirements of Section 55.33(a)(1).

Title 10 of the Code of Federal Regulations 55.33(a)(1) requires, in part, that applicants' medical condition and general health will not adversely affect the performance of assigned operator job duties or cause operational errors endangering public health and safety.

Title 10 of the Code of Federal Regulations 55.23 requires, in part, that to certify the medical fitness of the applicant, an authorized representative of the facility licensee shall complete and sign NRC Form 396, "Certification of Medical Examination by Facility Licensee."

Nuclear Regulatory Commission Form 396, when signed by an authorized representative of the facility licensee, certifies that a physician conducted a medical examination of the applicant and that the guidance contained in American National Standards Institute/American Nuclear Society (ANSI/ANS) Standard 3.4-1996, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants," was followed in conducting the examination and making the determination of medical qualification.

American National Institute/American Nuclear Society Standard 3.4-1996, Section 5.3, provides specific minimum capacities required for medical qualifications. Section 5.3.1 requires, in part, "ability to detect marker gases and products of combustion by provocation testing."

Contrary to the above, prior to April 3, 2014, the facility licensee provided information to the NRC that was not complete and accurate in all material respects. Specifically, the facility licensee had not completed medical examinations of licensed operators in

accordance with ANSI/ANS Standard 3.4-1996. The licensee submitted numerous NRC Forms 396 for renewal of senior reactor operator and reactor operator licenses, and for initial license applicants, that certified that the applicants met the medical requirements of ANSI/ANS Standard 3.4-1996 when, in fact, olfactory (combustion product odor) testing had not been conducted.

This violation is a Severity Level IV violation (Section 6.4).

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at Fort Calhoun Station within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to Notice of Violation; EA 15-020," and should include: (1) the reason for the violation or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

Dated this 30th day of March 2015.

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000285

License: DPR-40

Report: 05000285/2015010

Facility: Fort Calhoun Station

Location: 9610 Power Lane
Blair, NE 68008

Dates: November 17, 2014, through March 5, 2015

Inspector(s): T. Buchanan, Operations Engineer
S. Hedger, Operations Engineer

Approved By: Vince G. Gaddy,
Chief, Operations Branch
Division of Reactor Safety

SUMMARY

IR 05000285/2015010; 11/17/2014 – 03/05/2015; Fort Calhoun Station, Licensed Operator Requalification.

The report covered a three-month period of inspection by two region-based inspectors of licensee and NRC documents in the area of Operator Licensing. NRC inspectors documented one Severity Level IV violation that was evaluated in accordance with Section 2.3.2.a of the NRC Enforcement Policy. Although this violation has been placed in the corrective action program, a Notice of Violation is being issued and a response is being required for the NRC to better understand: (1) the cause of the failure to perform complete medical examinations as required, (2) the extent of condition for the failure to provide complete and accurate information and for the failure to meet the applicable ANSI standard, and (3) the corrective actions taken and planned at this time to assure all information submitted to the NRC is complete and accurate in all material respects. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." The cross-cutting aspect is determined using Inspection Manual Chapter 0310, "Components Within the Cross Cutting Areas." Findings for which the significance determination process does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified Findings and Self-Revealing Findings

No violations of significance were identified.

B. Licensee-Identified Violations

SL-IV: On April 3, 2014, during performance of a self-assessment, the licensee identified a Severity Level IV violation of 10 CFR 50.9, "Completeness and Accuracy of Information," for the Fort Calhoun Station's failure to perform combustion order testing as required in American National Standards Institute Standard 3.4-1996 for physical examinations of licensed operators and as documented in NRC Form 396, "Certification of Medical Examination by Facility Licensee." Although licensed operators were subsequently tested and found to have passed the olfactory tests, this failure had regulatory significance because the incomplete and inaccurate information was provided under a signed statement to the NRC and impacted numerous licensing decisions.

The failure to maintain information required by the Commission's regulations complete and accurate in all material respects in accordance with 10 CFR 50.9 was a performance deficiency. The failure to properly perform medical examinations in accordance with ANS/ANSI 3.4-1996 as documented on NRC Form 396 was a performance deficiency and a violation of 10 CFR 50.9, "Completeness and Accuracy of Information". Traditional enforcement applied to this finding because it involved a violation that impacted the regulatory process. Assessing the violation in accordance with the Enforcement Policy, the team determined it to be of Severity Level IV because all the licensed operators subsequently passed the combustion odor testing

(Enforcement Policy Example 6.4.d.1(c)). A cross-cutting aspect was not assigned as this was a traditional enforcement violation without an associated reactor oversight process finding. (Section 1R11)

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R11 Licensed Operator Requalification (71111.11B)

.1 Biennial Inspection

a. Inspection Scope

The inspectors reviewed licensee records and related NRC regulations associated with operator licensing. The inspectors verified licensee actions to comply with medical standards delineated in American National Standards Institute/American Nuclear Society (ANSI/ANS) Standard 3.4-1996, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants," and with 10 CFR 55.21, "Medical examination;" 10 CFR 55.23, "Certification;" 10 CFR 55.33, "Disposition of an initial application;" and 10 CFR 55.53, "Conditions of licenses." The inspectors reviewed Condition Report CR-2014-05108 and its associated corrective actions.

b. Findings

1. Introduction. On April 3, 2014, during performance of a self-assessment, the licensee identified a Severity Level IV cited violation of 10 CFR 50.9, "Completeness and Accuracy of Information," for the Fort Calhoun Station's failure to perform combustion order testing as required in American National Standards Institute Standard 3.4-1996 for physical examinations of licensed operators and as documented in NRC Form 396, "Certification of Medical Examination by Facility Licensee." Although licensed operators were subsequently tested and found to have passed the olfactory tests, this failure had regulatory significance because the incomplete and inaccurate information was provided under a signed statement to the NRC and impacted numerous licensing decisions.

Description. Applicants for licensed reactor operator and senior reactor operator positions are required to be medically examined as part of the licensee's initial operator license program. Similarly, previously qualified operator licenses expire every six years and must be renewed to allow the operator to continue to perform license duties. When a license renewal occurs, the licensee must submit an NRC Form 398, "Personal Qualification Statement – Licensee," and an NRC Form 396, "Certification of Medical Examination by Facility Licensee," (required by 10 CFR 55.21) to the NRC. The NRC Form 396 certifies, when signed by a senior facility licensee official, that the operator has been examined by a doctor and meets the medical standards in the ANSI/ANS 3.4 edition specified.

Additionally, Information Notice 2004-20, "Recent Issues Associated with NRC Medical Requirements for Licensed Operators," was issued November 24, 2004, discussing problems identified in licensees' implementation of medical examinations for applicants

and holders of licensed operators. An example was provided where a facility licensee identified that some tests specified in the ANSI standard (specifically nose sensitivity and neurological testing) had not been completed for any of its licensed operators. The information notice reminded licensees that licensed operators and the personnel who perform and interpret their medical examinations need to be familiar with the regulatory requirements and guidelines. Another Information Notice, IN 2009-21, "Incomplete Medical Testing for Licensed Operators," issued September 30, 2009, discusses additional examples where facility licensees failed to perform all ANSI Standard 3.4 required medical testing, including another example where olfactory testing was not completed.

On April 3, 2014, while performing a self-assessment, the licensee identified that one ANSI standard requirement for the physical examination was not being administered as part of the medical examination. Specifically, ANS/ANSI 3.4-1996, Section 5.3.1, required operators be able to detect odor of products of combustion. The licensee documented this condition on Condition Report CR-2014-05108.

By April 25, 2014, all licensed operators assigned to the control room were subjected to olfactory testing prior to assuming shift responsibilities. All licensed operators submitted to, and passed, olfactory testing.

During the review of this issue, the licensee determined that there were no records of testing requirements for products of combustion (olfactory testing) ever being performed. Prior to April 3, 2014, NRC Region IV issued and renewed numerous operator licenses based on the NRC Form 396 signed by the facility licensee stating that licensed operators (and operator license applicants) had received a medical examination following the criteria provided by ANS/ANSI 3.4-1996. The information provided to the NRC in the various license renewal applications (and initial license applications) was material to the NRC licensing action. Because the license applications inappropriately certified on NRC Form 396 that the requirements of ANS/ANSI Standard 3.4-1996 were met, licensing actions were taken by NRC Region IV that were incorrect. Because the licensee failed to provide complete and accurate information to the NRC in the license renewal applications (and initial license applications), this was identified as a SL-IV violation of 10 CFR 50.9.

Analysis: The failure to maintain information required by the Commission's regulations complete and accurate in all material respects in accordance with 10 CFR 50.9 was a performance deficiency. The failure to properly perform medical examinations in accordance with ANS/ANSI Standard 3.4-1996 as documented on NRC Form 396 was a performance deficiency and a violation of 10 CFR 50.9, "Completeness and Accuracy of Information". Traditional enforcement applied to this finding because it involved a violation that impacted the regulatory process. Assessing the violation in accordance with the Enforcement Policy, the team determined it to be of Severity Level IV because all the licensed operators subsequently passed the combustion odor testing (Enforcement Policy example 6.4.d.1(c)). A cross-cutting aspect was not assigned as this was a traditional enforcement violation without an associated reactor oversight process finding.

Enforcement: Title 10 of the Code of Federal Regulations (10 CFR) 50.9 requires, in part, that information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects. Title 10 of the Code of Federal Regulations 55.21 requires, in part, that an applicant for a license shall have a medical examination by a physician and the licensee shall have a medical examination by a physician every two years. The physician shall determine that the applicant or licensee meets requirements of Section 55.33(a)(1). Title 10 of the Code of Federal Regulations 55.33(a)(1) requires, in part, that applicants' medical condition and general health will not adversely affect the performance of assigned operator job duties or cause operational errors endangering public health and safety. Title 10 of the Code of Federal Regulations 55.23 requires, in part, that to certify the medical fitness of the applicant, an authorized representative of the facility licensee shall complete and sign NRC Form 396, "Certification of Medical Examination by Facility Licensee."

NRC Form 396, when signed by an authorized representative of the facility licensee, certifies that a physician conducted a medical examination of the applicant and that the guidance contained in American National Standards Institute/American Nuclear Society (ANSI/ANS) Standard 3.4-1996, "Medical Certification and Monitoring of Personnel Requiring Operator Licenses for Nuclear Power Plants," was followed in conducting the examination and making the determination of medical qualification. ANSI/ANS Standard 3.4-1996, Section 5.3, provides specific minimum capacities required for medical qualifications. Section 5.3.1 requires, in part, "ability to detect marker gases and products of combustion by provocation testing."

Contrary to the above, prior to April 3, 2014, the facility licensee provided information to the NRC that was not complete and accurate in all material respects. Specifically, the facility licensee had not completed medical examinations of licensed operators in accordance with ANSI/ANS Standard 3.4-1996. The licensee submitted numerous NRC Forms 396 for renewal of senior reactor operator and reactor operator licenses, and for initial license applicants, that certified that the applicants met the medical requirements of ANSI/ANS Standard 3.4-1996 when, in fact, olfactory (combustion product odor) testing had not been conducted.

After entering the issue into its corrective action program, the licensee performed the missing olfactory combustion odor testing on all licensed operators. All operators passed the test prior to returning to licensed duties. Additionally, the licensee is planning to hire a site nurse who will have cognizance of the ANS/ANSI Standard 3.4-1996 requirements for the medical examination of licensed operators. The team determined that no immediate safety concern remained because all operators had passed the combustion odor test and procedures had been updated to include this testing requirement.

Although this violation has been placed in the corrective action program, a Notice of Violation is being issued and a response is being required for the NRC to better understand: (1) the cause of the failure to perform complete medical examinations as required, (2) the extent of condition for the failure to provide complete and accurate

information and for the failure to meet the applicable ANSI standard, and (3) the corrective actions taken and planned at this time to assure all information submitted to the NRC is complete and accurate in all material respects: NOV 05000285/2015010-01, Failure to Provide Complete and Accurate Information on Licensed Operator Applications.

4. OTHER ACTIVITIES

40A6 Meetings

Exit Meeting Summary

The inspectors telephonically exited with Mr. S. Dean, Plant Manager, and other members of the licensee's staff on the results of the licensed operator requalification program inspection on March 5, 2015. The licensee representatives acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

S. Shea, Operations Training Manager
C. Verdoni, Supervisor, Operations Training (Requalification)
R. Peter, Licensing Coordinator
E. Matzke, Senior Nuclear Licensing Engineer
R. Lowery, Senior Operations Training Instructor

NRC Personnel

M. Schneider, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000285/2015010-01	NOV	Failure to Provide Complete and Accurate Information on Licensed Operator Applications
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LIST OF DOCUMENTS REVIEWED

Section 1R11: Licensed Operator Requalification

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
TQ-AA-150	Operator Training Programs	10
OPD-3-11	License Activation and Watchstation Maintenance	19
SO-G-64	Medical Examination Program for Worker Qualification	35
SO-O-42	Notification to the NRC of Licensed Personnel Disability, Permanent Reassignment or Termination	8
OP-AA-105-102	NRC Active License Maintenance	11
TQ-AA-224	Exelon Nuclear Training – Implementation Phase	8
FC-1300A	Instructions for Completing Medical Examinations	6

Miscellaneous

<u>Number</u>	<u>Title</u>	<u>Date</u>
RA 2013-3620	Focused Area Self-Assessment: 71111.11b Compliance	October 31, 2014

Condition Reports

2013-05070	2013-05570	2013-16631	2013-19712	2013-23048
2014-01221	2014-01671	2014-01672	2014-05108	2014-06806
2014-09826	2014-11190	2014-11379	2014-11493	2014-12933
2014-14104	2014-14105	2014-14148	2014-14190	