



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

February 4, 2016

Mr. C. R. Pierce  
Regulatory Affairs Director  
Southern Nuclear Operating Co., Inc.  
P.O. Box 1295, Bin 038  
Birmingham, AL 35201-1295

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4 - REQUEST FOR ADDITIONAL INFORMATION (CAC NOS. MF6670, MF6671, MF6672, MF6673, MF6674, MF6675, AND RP9516)

Dear Mr. Pierce:

By letter dated August 31, 2015, the Southern Nuclear Operating Company, Inc., (SNC) submitted an amendment request for Joseph M. Farley Nuclear Plant, Units 1 and 2, Edwin I. Hatch Nuclear Plant, Units 1 and 2, and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4. The amendment requests NRC approval of a standard emergency plan for all SNC sites and site-specific annexes.

The NRC staff has determined that additional information is needed as discussed in the Enclosure. We request that SNC respond by April 8, 2016. Please note that the NRC staff's review is continuing and further requests for information may be developed.

Sincerely,

A handwritten signature in black ink that reads "Shawn Williams".

Shawn Williams, Project Manager  
Plant Licensing Branch, II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.  
50-348, 50-364, 50-321, 50-366  
50-424, 50-425, 52-025, 52-026

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUESTS FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST

FLEET STANDARD EMERGENCY PLAN

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

VOGTLE ELECTRIC GENERATING STATION, UNITS 1 AND 2

VOGTLE ELECTRIC GENERATING STATION, UNITS 3 AND 4

DOCKET NUMBERS 50-321, 50-366, 50-348, 50-364,

50-424, 50-425, 52-25 AND 52-26

By letter dated August 31, 2015, Southern Nuclear Operating Company (SNC) requested approval for a fleet standard emergency plan and site-specific Annexes for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1, 2, 3 and 4 (Agencywide Documents Access and Management System (ADAMS) Accession No. Package Accession No. ML15246A045).

The Nuclear Regulatory Commission (NRC) staff has completed its initial technical review of the proposed SNC fleet standard emergency plan related to proposed changes to Emergency Response Organization (ERO) on-shift and augmentation staffing. The enclosed requests for additional information (RAIs) are needed to support NRC staff's continued technical review of the proposed site-specific Annexes.

Joseph M. Farley, Units 1 and 2

The RAIs listed below, are applicable to Enclosure 4, "Farley Staffing - Detailed Description and Technical Evaluation" and are needed to support NRC staff's continued technical review to determine the acceptability of the proposed site-specific FNP Annex.

RAI-FNP-1

Enclosure 2 (page E2-7), "Definitions," does not include the term "hostile force." This term is defined in the current FNP Emergency Plan (Version 64). Please justify the omission of the definition, or revise accordingly.

RAI-FNP-2

Enclosure 4 (page E4-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the FNP staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance.

Enclosure

However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Farley Nuclear Plant On-Shift Staffing in Enclosure 5, “Farley Standard Emergency Plan Annex,” provides a Note 2 stating that this function “may be provided by shift personnel assigned other functions.”

Please explain whether this function will be performed by a dedicated Communicator since the justification for the propose change of reducing the current number of personnel from 2 to 1 is that the function “may be assigned to a member of the control room staff with no collateral tasks.”

#### RAI-FNP-3

Enclosure 4 (page E4-7) states, in part:

Revision 64.0.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an assistant to drive a vehicle. As part of the proposed SNC Fleet Emergency Plan, the FNP on-shift staffing for the on-site out of plant survey will be performed by a single Radiation Protection (RP) technician or other appropriately trained individual.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

#### RAI-FNP-4

Enclosure 4 (page E4-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan FNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

RAI-FNP-5

Enclosure 4 (page E4-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

RAI-FNP-6

Enclosure 5, Section 2.2.2 (page E5-11) states:

The FNP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Section V.B, "Organization Activation," of the current FNP Emergency Plan, nor the existing FNP procedure FNP-0-EIP-0.0, "Emergency Organization." These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes to the current FNP Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-FNP-7

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Section V.B, "Organization Activation," of the current FNP Emergency Plan, the existing FNP procedure FNP-0-EIP-0.0, "Emergency Organization," nor the "proposed column" of the table provided in Enclosure 6 (page E6-201). These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current FNP Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-FNP-8

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the FNP Emergency Plan?

RAI-FNP-9

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

Edwin I. Hatch Nuclear Plant, Units 1 and 2

The RAIs listed below, are applicable to Enclosure 7, "Hatch Staffing - Detailed Description and Technical Evaluation," and are needed to support NRC staff's continued technical review to determine the acceptability of the proposed site-specific HNP Annex.

RAI-HNP-1

Enclosure 7 (page E4-4), "Notification and Communication," states, in part:

However, an additional Reactor Operator will be added to the HNP control room staff to ensure there will be sufficient appropriately trained personnel on-shift for the Communications function to be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Hatch Nuclear Plant On-Shift Staffing in Enclosure 7, "Hatch Standard Emergency Plan Annex," provides a Note 2 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator.

RAI-HNP-2

Enclosure 7 (page E4-7) states, in part:

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides two individuals for the task of off-site survey and an additional individual for the task of on-site (out of plant) survey. Collectively, these individuals include one individual qualified to perform the survey, an assistant to drive the team vehicle, and an individual is to coordinate communications between the survey team and the dose assessor. As part of the proposed SNC Fleet Emergency Plan, the HNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained personnel.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as performance of multiple tasks simultaneously (i.e., driving vehicle communications, plume monitoring) been considered?

RAI-HNP-3

Enclosure 7 (page E7-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan HNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

RAI-HNP-4

Enclosure 7 (page E7-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

RAI-HNP-5

Enclosure 8, Section 2.2.2 (page E5-11) states:

The HNP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Table B-1, "Minimum Staffing Capacity for Emergencies," of the current HNP Emergency Plan, nor the existing HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation." These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes to the current HNP Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-HNP-6

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing Capacity for Emergencies," of the current HNP Emergency Plan, the existing HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation," nor the "proposed column" of the table provided in

Enclosure 9 (page E9-251). These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current HNP Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-HNP-7

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the HNP Emergency Plan.

RAI-HNP-8

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

Vogtle Electric Generating Station, Units 1 and 2

The RAIs listed below, are applicable to Enclosure 10, "Vogtle 1 and 2 Staffing - Detailed Description and Technical Evaluation," and are needed to support NRC staff's continued technical review to determine the acceptability of the proposed site-specific Annex.

RAI-VEGP-1

Enclosure 10 (page E10-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the VEGP Unit 1 and 2 staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Vogtle Electric Generating Plant On-Shift Staffing in Enclosure 11, "Vogtle 1 and 2 Standard Emergency Plan Annex," provides a Note 2 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator, since the justification for the proposed change of reducing the current number of personnel from 2 to 1 is that the function "may be assigned to a member of the control room staff with no collateral tasks."

RAI-VEGP-2

Enclosure 10 (page E10-6) states, in part:

Revision 63.0.0 of the VEGP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an assistant to drive a vehicle. As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 1 and Unit 2, on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 3 and Unit 4. ... The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

RAI-VEGP-3

Enclosure 10 (page E10-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan VEGP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

RAI-VEGP-4

Enclosure 10 (page E10-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?



RAI-VEGP-5

Enclosure 11, Section 2.2.2 (page E11-11) states:

The VEGP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on emergency response facility minimum staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing for Power Operation," of the current VEGP Unit 1 & 2 Emergency Plan, nor the existing VEGP Unit 1 & 2 procedures - such as Procedure No.91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20 "Activation and Operation of the Technical Support Center." These differences are not identified in this LAR, nor are they justified. Please identify all proposed changes to the current VEGP Unit 1 & 2 Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-VEGP-6

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing for Power Operation," of the current VEGP Unit 1 & 2 Emergency Plan, nor the existing VEGP Unit 1 & 2 procedures - such as Procedure No. 91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20, "Activation and Operation of the Technical Support Center," nor the "proposed column" of the table provided in Enclosure 12 (page E12-216). These differences are not identified in this LAR, nor are they justified. Please identify all proposed changes made to the current Vogtle Units 1 & 2 Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-VEGP-7

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the Vogtle Unit 1 & 2 Emergency Plan.

RAI-VEGP-8

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

Vogtle Electric Generating Station, Units 3 and 4

The RAIs listed below, are applicable to Enclosure 13, "Vogtle 3 and 4 Staffing - Detailed Description and Technical Evaluation," and are needed to support NRC staff's continued technical review to determine the acceptability of the proposed site-specific Annex.

RAI-VEGP3&4-1

Enclosure 13 (page E13-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the VEGP Units 3 and 4 staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Vogtle Electric Generating Plant On-Shift Staffing in Enclosure 14, "Vogtle 3 and 4 Standard Emergency Plan Annex," provides a Note 1 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator, since the justification for the propose change of reducing the current number of personnel from 2 to 1 is that the function "may be assigned to a member of the control room staff with no collateral tasks."

RAI-VEGP3&4-2

Enclosure 13 (page E13-6) states, in part:

As part of the proposed SNC Fleet Emergency Plan for VEGP Units 3 and Unit 4, on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual shared with VEGP Units 1 and Unit 2. ... The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

RAI-VEGP3&4-3

Enclosure 13 (page E13-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan FNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

RAI-VEGP3&4-4

Enclosure 13 (page E13-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

RAI-VEGP3&4-5

Enclosure 13 (page E13-9) states, in part:

The current version of the VEGP Units 3 and Unit 4 Emergency Plan provides for one mechanical journeyman, one electrical journeyman, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. These numbers will be maintained in the proposed SNC Fleet Emergency Plan. However, these positions will be shared for the VEGP site, as the maintenance personnel will be trained and qualified to perform work on VEGP Units 1 and 2 and Units 3 and 4. In addition to these personnel, a maintenance supervisor will be added to shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability. This position will also be shared for the VEGP site.

Please explain how the proposed compliment of maintenance personnel could support timely and effective repair and corrective actions if a simultaneous event classification at multiple units (e.g., were to affect Units 1 or 2 and Units 3 or 4 (one of each reactor type) simultaneously).

RAI-VEGP3&4-6

Enclosure 14, Section 2.2.2 (page E14-11) states:

The Vogtle Units 3 & 4 Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Section B, "VEGP emergency response organization" of the current VEGP Units 3 & 4 Emergency Plan. The differences are not identified in this request as changes, nor are they justified.

Please identify all proposed changes to the current VEGP Units 3 & 4 Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-VEGP3&4-7

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Section B, "VEGP emergency response organization" of the current VEGP Units 3 & 4 Emergency Plan. The differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current VEGP Units 3 & 4 Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

RAI-VEGP3&4-8

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the VEGP Units 3 & 4 Emergency Plan.

RAI-VEGP3&4-9

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

Mr. C. R. Pierce  
 Regulatory Affairs Director  
 Southern Nuclear Operating Co., Inc.  
 P.O. Box 1295, Bin 038  
 Birmingham, AL 35201-1295

**SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4 - REQUEST FOR ADDITIONAL INFORMATION (CAC NOS. MF6670, MF6671, MF6672, MF6673, MF6674, MF6675, AND RP9516)**

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The NRC staff has determined that additional information is needed as discussed in the Enclosure. We request that SNC respond by April 8, 2016. Please note that the NRC staff's review is continuing and further requests for information may be developed.

Sincerely,

**/RA/**  
 Shawn Williams, Project Manager  
 Plant Licensing Branch, II-1  
 Division of Operating Reactor Licensing  
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**ADAMS Accession No.: ML16029A035**

**\*By e-mail**

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