
POLICY ISSUE

(Notation Vote)

August 19, 2016

SECY-16-0098

FOR: The Commissioners

FROM: Victor McCree
Executive Director for Operations

SUBJECT: TRIBAL CONSULTATION POLICY STATEMENT AND PROTOCOL

PURPOSE:

To request Commission approval to publish the final U.S. Nuclear Regulatory Commission (NRC) Tribal Policy Statement in the *Federal Register*.

SUMMARY:

On May 22, 2012, the Commission directed the staff to provide a proposed Policy Statement and protocol on consultation with Tribal governments (Staff Requirements Memorandum [SRM] for COMWDM-12-0001, "Tribal Consultation Policy Statement and Protocol") (Agencywide Documents Access and Management System (ADAMS) Accession No. ML121430233). On October 12, 2012, the NRC staff published a notice in the *Federal Register* requesting public comment on its existing Tribal Protocol Manual and requested suggestions for the development of an NRC Tribal Policy Statement (77 FR 62269). The *Federal Register* notice was issued for a 120-day public comment period. The staff also conducted outreach to Tribal governments and organizations through multiple channels, including participation in Tribal meetings held by Federal counterparts and Tribal organizations.

After review and consideration of the public comments, the staff developed a proposed NRC Tribal Policy Statement which was approved by the Commission in the SRM for SECY-14-0006, "Tribal Consultation Policy Statement and Protocol." The NRC staff published the proposed

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NRC Tribal Policy Statement in the *Federal Register* for a 120-day comment period on December 1, 2014 (79 FR 71136). The comment period was extended for an additional 60 days. The staff considered comments received from the public during the comment period, as well as input received during related outreach efforts.

The staff developed an NRC Tribal Policy Statement that aligns with related Executive Orders (EO) and Presidential Memoranda and reflects the NRC's commitment to upholding its Trust Responsibility with Federally recognized American Indian and Alaska Native Tribes. The NRC Tribal Policy Statement is a high-level and broad-reaching document that establishes general policy principles to be followed by the NRC to promote effective government-to-government interactions with Indian Tribes, and to encourage and facilitate Tribal involvement in the areas that the Commission has jurisdiction. The Tribal Policy Statement is not limited to specific regulatory programs or statutory obligations to consult with Tribal governments, such as the National Historic Preservation Act. Instead, it covers all interactions between the NRC and Federally recognized Tribes related to actions within the agency's regulatory purview.

The NRC Tribal Policy Statement is intended to enhance government-to-government relations with Federally recognized Tribes and underscores the NRC's commitment to conducting outreach to Tribes and engaging in timely consultation. The NRC Tribal Policy Statement also reinforces the NRC's commitment to coordinating with other Federal agencies. Although the NRC Tribal Policy Statement covers Federally recognized American Indian Tribes and Alaska Native Tribes, it also encourages State-recognized Tribes to participate in the NRC regulatory process. The staff recommends that the Commission approve the final NRC Tribal Policy Statement (enclosed).

BACKGROUND:

Executive Orders and Presidential Memoranda

EOs and Presidential Memoranda dating from President Nixon's "Special Message on Indian Affairs" in 1970 have addressed legislative and policy-making implications related to Federally recognized Tribes.¹ Presidents Ronald Reagan, George H.W. Bush, William J. Clinton, George W. Bush, and Barack H. Obama issued EOs or Presidential Memoranda concerning the Federal Government's relationship with Tribes.² In particular, on November 9, 2000, President Clinton issued EO 13175, "Consultation and Coordination with Indian Tribal Governments," (65 FR 67249) to promote the establishment of regular and meaningful consultation and collaboration with Tribal officials in the development of Federal policies that have Tribal implications, strengthen the United States government-to-government relationships with Indian Tribes, and reduce the imposition of unfunded mandates.

¹ Richard Nixon's "Special Message to the Congress on Indian Affairs," July 8, 1970. Online by Gerhard Peters and John T. Woolley, *The American Presidency Project*. <http://www.presidency.ucsb.edu/ws/?pid=2573>

² Executive Orders and Presidential papers from previous administrations dating back to 1993 can be viewed electronically on the U.S. Government Publishing Office's Web site at: <https://www.gpo.gov/fdsys/browse/collection.action?collectionCode=CPD>. Public Papers of previous administrations may be viewed online at: <http://www.presidency.ucsb.edu/> as part of the University of California's American Presidency Project.

EO 13175 articulated the following fundamental principles to guide Federal agencies formulating or implementing policies that have Tribal implications:

- The United States has a unique legal relationship with Indian Tribal governments as set forth in the Constitution of the United States, treaties, statutes, EOs, and court decisions. The Federal Government recognizes Indian Tribes as domestic dependent nations under its protection and has enacted statutes and promulgated regulations that establish and define a trust relationship with Indian Tribes.
- The Federal Government has recognized the right of Indian Tribes to self-government with inherent sovereign powers over their members and territory. The United States continues to work with Indian Tribes on a government-to-government basis to address issues concerning Tribal self-government, Tribal trust resources, and Indian Tribal treaty and other rights.
- The United States recognizes the right of Indian Tribes to self-government and supports Tribal sovereignty and self-determination.

As an independent regulatory agency, the NRC is exempt from the requirements of certain EOs, including EO 13175. However, on January 16, 2001, the Commission sent correspondence to the Office of Management and Budget stating, “in exercising its regulatory authority this agency [NRC] acts in a manner consistent with the fundamental precepts expressed in the Order [EO 13175]” (ADAMS Accession No. ML010260297). To that end, the Commission has developed agency practices for Tribal consultation that promote consultation and cooperation with Tribal governments fully consistent with the principles articulated in EO 13175.³

NRC Current Practices for Tribal Interaction

The NRC’s past and current practice for government-to-government interaction with Federally recognized Tribes reflects the spirit of the relevant EOs, without establishing a formal policy. The NRC has interacted with Tribal governments on a case-by-case basis, allowing the NRC and the Tribes to initiate communication and consultation. The NRC staff also maintains working relationships with Tribal governments and Tribal organizations that have an interest in NRC regulated activities.

Development of the Tribal Policy Statement

In SECY-96-187, “Policy Issues Raised in Meeting with Prairie Island Dakota Indian Representatives” (ADAMS Accession No. ML040120574) NRC staff provided to the Commission an analysis of Tribal issues. The paper centered on issues raised by representatives from the Prairie Island Indian Dakota Community including: 1) entering into a

³ See also, the NRC letter to the Office of Management and Budget (OMB), dated March 10, 2010 (ADAMS Accession No. ML093620067), confirming that as an independent agency the NRC does not have to comply with President Obama’s 2009 Memorandum requirements for executive departments and agencies. The Memorandum established requirements for departments and agencies to report to OMB their plan of action to implement the policies and directives of EO 13175, and to submit annual progress reports regarding Tribal consultation activities. The communication confirmed that the NRC acts in a manner consistent with the fundamental precepts of EO 13175. The 2009 Presidential Memorandum on Tribal Consultation can be found online at: <https://www.whitehouse.gov/the-press-office/memorandum-tribal-consultation-signed-president>.

Memorandum of Understanding with the NRC; 2) allowing Tribal representatives to observe inspections at the Prairie Island Nuclear Generating Plant; and 3) developing a formal policy on cooperation with Federally recognized Tribes. The staff recommended that the Commission not develop a formal policy on cooperation with Federally recognized Tribes. In the SRM dated November 13, 1996, the Commission approved the staff's recommendation not to develop a formal policy on cooperation with Federally recognized Tribal governments at that time, and to continue addressing Native American issues on a case-by-case basis and cooperating with Tribal governments on a government-to-government basis (ADAMS Accession No. ML040120150).

On January 8, 2009, the Commission issued SRM-M081211, from the December 2008 "Briefing on Uranium Recovery," (ADAMS Accession No. ML090080206), directing the staff to develop and implement an internal protocol for interaction with Native American Tribal Governments that would allow for custom tailored approaches to address both the NRC and Tribal interests on a case-by-case basis. The Commission also directed the staff to assess what policies other Federal agencies have for interactions with Native American Tribal Governments and report those findings to determine the efficacy of an NRC Tribal Policy Statement. In December 2009, the staff responded to the Commission direction with SECY-09-0180, "U.S. Nuclear Regulatory Commission's Interactions with Native American Tribes" (ADAMS Accession No. ML092800263). The staff communicated the determination that the NRC's case-by-case approach to interaction was effective and met the needs of the Commission and the Tribes. The staff concluded that Tribal interactions would not benefit from a formal Tribal policy at that time.

As previously mentioned, on May 22, 2012, the Commission issued the SRM for COMWDM-12-0001, directing the NRC staff to provide a proposed Policy Statement and protocol on consultation with Tribal governments. The Commission also directed the NRC staff to do the following when developing the proposed policy statement: (1) use the existing "Tribal Protocol Manual: Guidance for NRC Employees," and the NRC staff's ongoing efforts outlined in SECY-09-0180 as a starting point and the basis for developing the proposed policy statement and protocol; (2) seek input from the Tribes and the public on how to improve the existing manual; (3) clearly articulate that the NRC's actions must be in accordance with its governing statutes and regulations in the policy statement and protocol; (4) respect and reflect sensitivity to the distinction made in EOs and statutes between Indian Tribes who are Federally recognized and those who are not in the policy statement and protocol; (5) indicate that the NRC will conduct outreach to State-recognized Tribes on a case-by-case basis in the policy statement and protocol; (6) explore additional opportunities within our current regulatory processes for information sharing and outreach to State-recognized Tribes; and (7) make the protocol prominently publicly available on the NRC's public Web site. The Commission also specified that the proposed policy statement should serve as a high-level foundation for the protocol and should echo the language and spirit of the relevant Presidential Memoranda and EOs.

The staff formed an agency working group to develop a proposed NRC Tribal Policy Statement and to revise the NRC Tribal Protocol Manual. On October 12, 2012 (77 FR 62269), the NRC requested public comment on its existing Tribal Protocol Manual and requested suggestions for the development of a proposed NRC Tribal Policy Statement. The public comment period was open for 180 days. The NRC received a total of six comment letters.

The staff reviewed the public comments received for suggestions on the proposed NRC Tribal Policy Statement and for revisions to the Tribal Protocol Manual. The NRC staff also engaged with Tribal governments and other interested parties by: (1) collaborating with the National Congress of American Indians to conduct mass mailings to Federally recognized Tribes, and (2) participating in Tribal meetings hosted by Tribal organizations and other Federal agencies; these meetings included attendees from Federally recognized and State-recognized Tribes.⁴ Additionally, the NRC staff reviewed Tribal policy statements of executive departments, their related agencies, and other independent agencies and provided its findings to the Commission in SECY-14-0006 “Tribal Consultation Policy Statement and Protocol” (ADAMS Accession No. ML14240A083).

On August 27, 2014, the Commission issued the SRM for SECY-14-0006, “Tribal Consultation Policy Statement and Protocol,” approving the publication of the Draft Statement of Policy on Tribal Consultation and Coordination in the *Federal Register*. On December 1, 2014 (79 FR 71136), the NRC published the proposed NRC Tribal Policy Statement in the *Federal Register* for public comment.

DISCUSSION:

The final NRC Tribal Policy Statement is based on the staff’s implementation of the Commission’s direction in the SRMs for COMWDM-12-0001 and SECY-14-0006; review of other Federal agency Tribal policies (see SECY-14-0006); alignment with EO 13175; the staff’s evaluation of the public comments received on the October 2012 and December 2014 *Federal Register* notices; comments received from NRC offices; and information received during outreach efforts and informal dialogue with Tribal governments and organizations.

During the 180-day public comment period on the 2012 *Federal Register* notice, the NRC received six comment letters from two Tribal governments, two mining associations, one inter-Tribal organization, and a Tribal college. The staff conducted outreach on the 2012 *Federal Register* notice to a diverse population of Tribal representatives by: participating in standing Tribal conferences hosted by Federal partners and regional and national Tribal organizations, conducting mass mailings and one-on-one communications with Federally recognized Tribes; and communicating via electronic communications and media advertisements.⁵

⁴ No Tribes requested consultation on the Tribal Policy Statement as a result of NRC staff outreach.

⁵ The staff reviewed its outreach methods and concluded that an effective outreach approach for soliciting meaningful comments and suggestions from Tribal governments should include NRC participation in Tribal conferences and meetings with Tribal leaders. During the NRC Tribal Policy Statement public comment period, the staff participated in regional Tribal leadership meetings and engaged Tribal Chairmen or Council members. The meetings were a useful vehicle for seeking input on the NRC Tribal Policy Statement and the Tribal Protocol Manual and will inform future implementation efforts. Each Tribe is unique, with its own culture, history, and identity, and has its own priorities for protecting citizen health and welfare. A list of all outreach efforts can be found in NRC Tribal Liaison Annual Report Fiscal Year (FY) 2015 (ADAMS Accession No. ML15247A011).

The final NRC Tribal Policy Statement establishes six policy principles to be followed by the NRC to promote effective government-to-government relations with Indian Tribes, and to encourage and facilitate Tribal involvement in the areas over which the Commission has jurisdiction:

1. The NRC Recognizes the Federal Trust Relationship and Will Uphold its Trust Responsibility to Indian Tribes.
2. The NRC Recognizes and Is Committed to a Government-to-Government Relationship with Indian Tribes.
3. The NRC Will Conduct Outreach to Indian Tribes.
4. The NRC Will Engage in Timely Consultation.
5. The NRC Will Coordinate with Other Federal Agencies.
6. The NRC Will Encourage Participation by State-recognized Tribes.

The final NRC Tribal Policy Statement accounts for the limited authority NRC has as an independent regulatory agency under the Atomic Energy Act of 1954 (AEA), as amended, and identifies the Deputy Executive Director for Materials, Waste, Research, State, Tribal, Compliance, Administration, and Human Capital Programs as NRC's Designated Tribal Official.

The following paragraphs provide information related to specific changes that were made since the proposed Tribal Policy Statement was published for comment in December 2014.

The definition of the term "consultation" has been revised to provide clarification and to allow greater distinction from other NRC interactions with Tribes in which the NRC may engage. The revision stems from comments submitted by multiple commenters, including the Advisory Committee on Historic Preservation (ACHP), suggesting there should be greater clarification. The staff has revised the definition of "consultation" to mean efforts to conduct meaningful and timely discussions between the NRC and Tribal governments on the NRC's regulatory actions that have substantial direct effects on one or more Indian Tribes. The NRC's Tribal consultation allows Indian Tribes the opportunity to provide input on regulatory actions with Tribal implications and is different from the outreach and public comment periods. The consultation process may include, but is not limited to, providing for mutually-agreed protocols, timely communication, coordination, cooperation, and collaboration. The consultation process provides opportunities for appropriate Tribal officials or representatives to meet with NRC management or staff to achieve a mutual understanding between the NRC and Tribes of their respective interests and perspectives.

The NRC staff has included definitions for two additional terms in the discussion section of the *Federal Register* notice in response to public comments. Multiple commenters suggested there should be greater clarification regarding the distinction between consultation and other NRC Tribal interactions. The ACHP, specifically, expressed concern that "interactions" could be confused with more formal government-to-government consultations and suggested that the NRC define the term "interactions." As a result, the NRC staff has revised the discussion section to include a definition of the term "interaction" in an effort to provide greater clarity. The term covers reciprocal actions involving the NRC and Indian Tribes, and may include, but is not limited to, outreach, consultation, coordination, training, and information exchanges with Indian Tribes. Interactions may be oral or written and can take place remotely (through electronic media) or in face-to-face meetings.

In response to comments from the ACHP, the staff also added a definition of “outreach.” The term “outreach” has been defined in the discussion section of the *Federal Register* notice in an effort to provide clarification and to allow greater distinction from Tribal consultation. “Outreach” refers to NRC staff efforts to inform Indian Tribes about the agency’s actions and plans. Outreach includes sharing information and encouraging Tribal governments to communicate their concerns and interests to NRC staff.

The definition of “Trust Responsibility” has been revised to provide additional clarification on the way that the NRC fulfills its Trust Responsibility to Indian Tribes. The revision stems from comments from multiple sources, including the ACHP. “Trust Responsibility” means a fiduciary duty on the part of the United States to protect Tribal treaty rights, lands, assets, and resources, as well as a duty to carry out the mandates of Federal law with respect to Indian Tribes. The NRC exercises its Trust Responsibility in the context of its authorizing statutes, which include the AEA, the Energy Reorganization Act of 1974, the Nuclear Waste Policy Act of 1982, the Low-Level Radioactive Waste Policy Act of 1985, and the Uranium Mill Tailings Radiation Control Act of 1978, as amended. As an independent regulatory agency that does not hold in trust Tribal lands or assets, or provide services to Federally recognized Tribes, the NRC implements its Trust Responsibility by ensuring that Tribal members receive the same protections under its implementing regulations that are available to other persons. The *Federal Register* notice has been revised to use the term Trust Responsibility clearly and consistently, replacing “fiduciary duty” or “Trust Relationship,” as appropriate, to clarify that NRC is committed to upholding its Trust Responsibility to Indian Tribes under the Federal Trust doctrine.

The discussion section related to Policy Principle 1, “The NRC Recognizes the Federal Trust Relationship and Will Uphold its Trust Responsibility to Indian Tribes,” has been revised to provide greater clarification related to the NRC’s Trust Responsibility to Indian Tribes and reflect the new definition of “Trust Responsibility.” Policy Principle 1 now reads:

The NRC shares the Federal government’s unique Trust Relationship with, and Trust Responsibility to, Indian Tribes. Under the Federal Trust Doctrine, the United States – and the individual agencies of the Federal government – owe a fiduciary duty to Indian Tribes. The nature of that duty depends on the underlying substantive laws (i.e., treaties, statutes, agreements) creating the duty. The NRC exercises its Trust Responsibility in the context of its authorizing statutes including the Atomic Energy Act, the Energy Reorganization Act of 1974, the Nuclear Waste Policy Act of 1982, the Low-Level Radioactive Waste Policy Act of 1985, and the Uranium Mill Tailings Radiation Control Act of 1978, as amended. As an independent regulatory agency that does not hold in trust Tribal lands or assets or provide services to Federally recognized Tribes, the NRC implements its Trust Responsibility by ensuring that Tribal members receive the same protections under its implementing regulations that are available to other persons.

The discussion section related to Policy Principle 2, “The NRC Recognizes and Is Committed to a government-to-government Relationship with Indian Tribes,” has been revised to clarify Tribal sovereignty. The staff received a written comment suggesting the addition of this language, and has obtained similar input during outreach efforts and interactions with Tribal representatives. Tribal governments have expressed concern about protection not only of their community but

also of their land and related natural resources. Inclusion of the additional language underscores the NRC's commitment to Tribal sovereignty which applies not only to Tribal people, but also to Tribal land. The policy has been revised by adding the text underlined below and now reads, "The NRC recognizes Tribal governments as dependent domestic sovereign nations, independent from State governments, with separate and distinct authorities with inherent sovereign powers over their members and territory, consistent with applicable statutes and authorities."

The discussion section of Policy Principle 3, "The NRC Will Conduct Outreach to Indian Tribes," has been revised to reflect that outreach is distinct from government-to-government consultation. The NRC Tribal Policy Statement reflects the distinction between outreach and consultation by setting forth two separate and distinct policy principles related to outreach and consultation. The staff received multiple comments related to the distinction between outreach to Tribes and consultation with Tribal governments related to a specific action. In an effort to provide further clarification regarding this distinction, the discussion section has been revised to reflect changes to the language to help reinforce the NRC's understanding of the two distinct concepts. Policy Principle 3 discussion section has been revised to read:

The NRC will conduct outreach to keep Indian Tribes informed about the agency's actions and plans, as appropriate, related to its regulatory actions that have substantial direct effects on one or more Indian Tribes. The NRC will participate in national and regional Tribal conferences and summits hosted by Federal agencies, Tribal governments, and Tribal organizations, as appropriate. The NRC will encourage Tribal governments to communicate their preferences to NRC staff during outreach activities and will seek to provide information about opportunities for Tribal participation in NRC meetings and advisory committees concerning NRC regulatory actions that have substantial direct effects on one or more Indian Tribes, as appropriate.

The discussion section related to Policy Principle 4, "The NRC Will Engage in Timely Consultation," has been revised to provide clarification related to the NRC and Tribal representatives who participate in consultations. The text has been revised to clarify that the NRC and Tribal representatives participating in consultations serve as their governments' respective decisionmakers, based on the established agenda and to the extent possible.

The discussion section related to Policy Principle 4 has also been revised to provide clarification related to the conditions under which consultation may occur. The NRC recognizes that it is responsible for upholding certain statutory obligations to consult with Federally recognized Tribes. This does not preclude Federally recognized Tribes from requesting to engage in consultation on matters that have not been identified by the NRC to have substantial direct effects on one or more Indian Tribes. The discussion section of the 2014 draft policy statement stated:

The NRC will provide timely notice to, and consult with, Tribal governments on NRC's regulatory actions that have substantial direct effects on one or more Indian Tribes. Tribal officials may request that the NRC engage in government-to-government consultation with them on matters that have not been identified by the NRC to have substantial direct effects on one or more Indian Tribes.

The word “also” has been added to the second sentence to provide additional clarity. As stated previously, the NRC has engaged with Tribal governments on a case-by-case basis, allowing a custom-tailored approach to Tribal engagement and initiation of interaction by both the NRC and Tribes. Although the NRC is responsible for initiating and engaging in Tribal consultation on certain matters under specific statutes, that does not preclude Tribal officials from requesting to engage in consultation on other matters.

The Policy Principle 4 discussion section now reads:

The NRC will provide timely notice and consult in good faith with Tribal governments on NRC’s regulatory actions that have substantial direct effects on one or more Indian Tribes.

Tribal officials may also request that the NRC engage in consultation with them on matters that have not been identified by the NRC to have substantial direct effects on one or more Indian Tribes. The NRC will make efforts to grant such requests, taking into consideration the nature of the activity at issue, past consultation efforts, available resources, timing issues, and other relevant factors.

The NRC will establish early communications and begin consultation as soon as practicable. The NRC will consult in good faith throughout the agency decisionmaking process and develop and maintain effective communication, coordination, and cooperation with Indian Tribes. The NRC representatives for consultations with Tribal officials or representatives will be of an appropriate rank and the level of interaction will be commensurate with the circumstances. The appropriate level of interaction will be determined by a discussion between the NRC and Tribal governments, and program office consultation procedures and guidance. Participating Tribal and NRC representatives will serve as respective decisionmakers, based on the established agenda and to the extent possible.

COMMITMENTS:

The Office of Nuclear Material Safety and Safeguards (NMSS) will continue to work with the program offices after the NRC Tribal Policy Statement’s anticipated issuance, supporting roll-out, communications, and training efforts, as appropriate.

The NRC staff will continue to seek ways to engage Tribal governments and organizations and other interested parties in the roll-out phase of the NRC Tribal Policy Statement.

The staff will update the Tribal Protocol Manual to include the NRC Tribal Policy Statement once the NRC issues the final NRC Tribal Policy Statement.

The staff will post the “NRC Tribal Liaison Annual Report Fiscal Year 2015” (ADAMS Accession No. ML15247A011) on the NRC’s public Web site.

RECOMMENDATIONS:

The NRC staff recommends that the Commission:

1. Approve the final NRC Tribal Policy Statement for publication in the *Federal Register*.
2. Note:
 - a. The staff has determined that this action is not a “major rule,” as defined in the Congressional Review Act of 1996 (5 U.S.C 804(2)) and is confirming this determination with OMB. The appropriate Congressional and Government Accountability Office contacts will be informed.
 - b. The appropriate Congressional committees will be informed.
 - c. A press release will be issued by the Office of Public Affairs when the final NRC Tribal Policy Statement is filed with the Office of the Federal Register.

RESOURCES:

Resources have been allocated within the Nuclear Material Users business line to fulfill the identified commitments. The NMSS intergovernmental liaison staff will continue to lead liaison efforts related to implementation of the NRC Tribal Policy Statement. Resources have been allocated to support Tribal invitational travel to conduct a Commission briefing before the issuance of the final NRC Tribal Policy Statement. As a part of implementation, the staff will monitor its activities and resource expenditures to identify any trends and keep the Commission informed of budgetary impacts. The resources for future needs beyond FY 2017 would be addressed through the Planning, Budgeting, and Performance Management process.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objections.

/RA/

Victor McCree
Executive Director
for Operations

Enclosure:
Draft *Federal Register* Notice

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Victor McCree
Executive Director
for Operations

Enclosure:
Draft *Federal Register* Notice

ADAMS Accession No.: ML16144A777

***via e-mail**

OFC	NMSS/MSTR	NMSS/MSTR R	NMSS/MSTR	NMSS/DUWP	NMSS/YMD	NMSS/DSF M	NMSS/FCS E	NRR
NAME	MRyan	LGibson	DCollins	JTappert*	JRubenstone*	MLombard*	CErlanger*	WDean*
DATE	3/16/16	3/17/16	4/06/16	4/29/16	6/2/16	4/29/16	4/22 /16	4/25/16
OFC	NRO	NSIR	RI	RII	RIII	RIV	OE	OCFO
NAME	JUhle*	BHolian*	DDorman*	Chaney*	CPederson*	MDapas*	PHolahan*	MWylie*
DATE	4/25/16	4/25/16	4/26/16	4/27/16	4/25/16	4/28/16	4/27/16	4/28/16
OFC	ADM	OCIO	RES	OGC	TechEd	NMSS	EDO	
NAME	CBladey*	KBenney*	MWeber*	JOlmstead*	WMoore	SMoore	VMcCree	
DATE	4/28/16	4/27/16	4/19/16	7/22/16	7/29/16	8/5/16	8/19/16	

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