

POLICY ISSUE
(Notation Vote)

October 4, 2017

SECY-17-0100

FOR: The Commissioners

FROM: Victor M. McCree
Executive Director for Operations

SUBJECT: SECURITY BASELINE INSPECTION PROGRAM ASSESSMENT
RESULTS AND RECOMMENDATIONS FOR PROGRAM EFFICIENCIES

PURPOSE:

This paper provides the results of the staff's assessment of the security baseline inspection program, including force-on-force (FOF) along with options and recommendations for Commission approval in response to the Commission's direction in Staff Requirements Memorandum (SRM) - SECY-16-0073, "Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088," dated October 5, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16279A345). Although the U.S. Nuclear Regulatory Commission (NRC) conducts security baseline inspections, including FOF exercises, for all licensees for which a design-basis threat (DBT) applies (i.e., operating nuclear power reactors and Category I fuel cycle facilities), the focus of this paper is on security baseline inspections at nuclear power reactors.

SUMMARY:

The staff completed an assessment of the security baseline inspection program, including FOF, and has found that the overall program remains effective. The staff has identified potential efficiencies and improvements that can be applied throughout the program. Consistent with the direction in SRM-SECY-16-0073, the staff examined: (1) the use of vulnerability assessments;

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(2) whether crediting operator actions, the use of diverse and flexible mitigation capabilities (FLEX) equipment, or response by local, State, and Federal law enforcement would improve the realism of FOF exercises; and (3) next steps for the existing integrated response program.

While industry's efforts to provide generic guidance on the use of vulnerability assessments are on hold, the staff continues to evaluate the available assessment tools and their potential applications to security at NRC-licensed facilities. The NRC currently provides credit for a limited number of operator actions and FLEX equipment as described in Regulatory Guide (RG) 5.81.¹ The staff is evaluating the technical basis to extend the RG 5.81 criteria to a broader set of operator actions and is working with stakeholders to update the document. The staff has evaluated whether the NRC should provide credit for local, State, and Federal law enforcement in responding to a security event within the DBT and determined that it is appropriate to explore options for providing such credit. The staff is developing potential methodologies for providing credit and plans to submit a subsequent paper to the Commission that will discuss both credit for local, State, and Federal law enforcement in responding to a security event and recommendations for the integrated response program. This subsequent paper could address any improvements in FOF exercise realism that may stem from such credit.

The staff has identified three potential options for the Commission's consideration to improve the efficiency of the FOF inspection program: (1) maintain the current program of two NRC-conducted FOF exercises at each nuclear power reactor facility on a triennial basis; (2) revise the FOF inspection program to include one NRC-conducted FOF exercise, followed by a defense-in-depth exercise² if the licensee's performance on the first FOF exercise is rated effective or a second NRC-conducted FOF exercise if it is not; or (3) revise the FOF inspection program to include one NRC-conducted FOF exercise and an enhanced NRC inspection of a licensee-conducted annual FOF exercise. Each of these options maintains the current suite of baseline inspection activities conducted under the security baseline inspection program.

The staff requests that the Commission approve the staff's proposal to revise the FOF inspection program to include one NRC-conducted FOF exercise and an enhanced NRC inspection of a licensee conducted annual FOF exercise (Option 3).

BACKGROUND:

In SRM-SECY-16-0073, the Commission approved the staff's recommendation to perform an assessment of the security baseline inspection program, including FOF. The Commission directed the staff to avoid attempting a fundamental redesign of the program, but to identify those areas most likely to yield efficiencies and improvements. Additionally, the Commission directed the staff to determine as part of its evaluation whether crediting operator actions, the use of FLEX equipment, or response by local, State, and Federal law enforcement would improve the realism of FOF exercises. The Commission also directed the staff to evaluate how vulnerability assessments could be used to evaluate the effectiveness of licensee protective strategies, and to discuss the next steps for the integrated response program based on the staff's evaluation of crediting law enforcement response during a security event. The Commission also directed the staff to be mindful that the concept of "high assurance" of

¹ Regulatory Guide 5.81, "Target Set Identification and Development for Nuclear Power Reactors" (Official Use Only-Security Related Information) (OUO-SRI).

² A defense-in-depth exercise is a reduced scope FOF inspection that begins testing at or inside the protected area boundary in order to evaluate the internal layers of the licensee's protective strategy.

adequate protection found in security regulations is equivalent to “reasonable assurance” when it comes to determining the appropriate level of regulation.

DISCUSSION:

Throughout its assessment of the security baseline inspection program, the staff engaged both internal and external stakeholders, through public meetings and written correspondence. Each meeting consisted of a public session followed by a closed session which enabled discussion of security-related information with cleared stakeholders. A summary of stakeholder interactions in response to SRM-SECY-16-0073 has been developed and placed in ADAMS under accession number ML17223A335.³ The following discussion is informed by the feedback received through these interactions.

Vulnerability Assessments

Some power reactor licensees have used a limited number of vulnerability assessment tools, primarily simulation software, to support their evaluations of proposed changes to their protective strategies and corresponding changes to their NRC-approved Physical Security Plans, Training and Qualification Plans, and Safeguards Contingency Plans (collectively referred to as “security plans”). At a March 2, 2017, public meeting, industry representatives indicated that, while they were previously interested in providing generic guidance on the use of vulnerability assessments, that industry effort is currently on hold due to other higher priority work. The staff is working with several vulnerability assessment tool vendors to gain knowledge and familiarity with the various types of tools, including a working knowledge of the data input parameters, limitations, concepts, and assumptions for each. Based on the staff’s experience reviewing security plan changes, the staff has determined that these tools could add value in support of the evaluation of licensee protective strategies and security plan changes. The staff will continue to work with industry, as industry priorities allow, to move forward in this area.

Operator Actions, FLEX Equipment, and Crediting Law Enforcement

As described in RG 5.81, licensees may, in the development of their target sets, take credit for operator actions, including those associated with additional equipment such as FLEX equipment. To take such credit, the operator actions should meet the following six criteria: (1) sufficient time is available to implement actions; (2) environmental conditions allow access; (3) adversary interference is precluded; (4) equipment is available and ready for use; (5) approved procedures exist; and (6) training is conducted on the existing procedures under conditions similar to the scenarios assumed. If an operator action meets these criteria, the operator action is credited as an additional element of the target set. The NRC currently provides credit for a limited number of operator actions to ensure that, in designing the site’s protective strategy, licensees only rely upon those operator actions for which there is reasonable assurance that the actions can be completed during an adversary attack and will be effective at preventing significant core damage or spent fuel sabotage. During FOF exercises, the NRC assumes that an operator action that is identified as a target set element will be completed. Industry is seeking to expand credit for operator actions in the development of target sets. On May 3, 2017, the Nuclear Energy Institute (NEI) submitted a white paper⁴ that outlined a proposed

³ Security Baseline Inspection Program Assessment Stakeholder Interactions in Response to SRM-SECY-16-0073 (ADAMS Accession No. ML17223A335).

⁴ NEI Cover Letter “Security Event Mitigation Assessment (SEMA) White Paper” dated May 3, 2017 (ADAMS Accession No. ML17171A199); NEI Letter “Redacted Version of NEI Security Event Mitigation Assessment” dated May 25, 2017 (ADAMS Accession No. ML17173A129).

methodology to extend the RG 5.81 criteria to a broader set of operator actions. Although the staff continues to evaluate the technical basis for NEI's proposal, the staff would use the current change management process to approve any additional operator actions through a revision to RG 5.81. The staff will continue to work with industry on these concepts and will seek feedback from stakeholders on RG 5.81 at appropriate points during the revision process.

The methodology proposed by NEI would also provide credit for a tactical law enforcement response to preclude adversary interference to allow completion of a mitigation action or strategy, which could include the use of FLEX equipment. The staff believes that the approval of such an approach would first require a change to the current Commission policy that licensees are expected to defend against the DBT without external assistance. In promulgating the DBT Final Rule⁵, the Commission recognized that "[t]he defense of our nation's critical infrastructure is a shared responsibility between the NRC, the [Department of Defense], the [Department of Homeland Security], Federal and State law enforcement and other Federal agencies. A reasonable approach in determining the threat requires making certain assumptions about these shared responsibilities." As further documented in the response to comments on the DBT Final Rule, "[t]he Commission has determined that the DBTs, as articulated in the rule, are based on adversary characteristics against which a private security force can reasonably be expected to defend." The Statement of Considerations (SOC) for the Power Reactor Security Requirements Final Rule⁶ further states that "a licensee's ability to defend against the design basis threat of radiological sabotage is not dependent on the availability of offsite responders." Finally, the SOC for the DBT Final Rule states that "local law enforcement and other non-licensee security personnel already stationed at the owner-controlled boundary or entry portals of some licensee facilities are not part of the licensee workforce and not subject to NRC regulatory authority."

The Commission has determined that licensees are reasonably expected to defend against the DBT and licensees design their security programs to do so. It is, therefore, reasonable for the FOF exercises to evaluate the ability of the licensee's security force to defend against the DBT unassisted. The NRC has no jurisdiction over law enforcement agencies, and the NRC does not have the ability to verify their availability. However, the current policy that the licensee maintain sole responsibility for defending against the DBT does not ignore the reality of law enforcement response to a security event within the DBT. NRC regulations currently require licensees to notify law enforcement agencies as part of their response procedures, and to document agreements with law enforcement agencies, including estimated response times and capabilities, to the extent practicable.⁷

Consistent with the Commission's direction, the staff has evaluated whether the NRC should provide credit for local, State, and Federal law enforcement in responding to a security event beyond the DBT. Because of the potential benefits from licensee coordination with law enforcement agencies, including law enforcement tactical teams, the staff has determined that it is appropriate to explore options for providing such credit. The staff plans to continue stakeholder engagement on this topic and to develop potential methodologies to provide credit for local, State, and Federal law enforcement response. The staff is considering several possible approaches to providing credit for local, State, and Federal law enforcement response, including an approach proposed by industry; establishing a new process for determining site-specific bounding times after which it could be assumed that law enforcement can support the response; and/or creating a regulatory framework for integrated response. Because these

⁵ Design Basis Threat Final Rule, March 19, 2007, 72 FR 12705.

⁶ Power Reactor Security Requirements Final Rule, March 27, 2009, 74 FR 13940.

⁷ See Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55(k)(8)(iii), (k)(9).

approaches would represent a change to Commission policy, the staff plans to provide the results of its evaluation, along with options and recommendations, in a subsequent paper to the Commission.

In responding to the Commission's direction to provide next steps for the integrated response program, the staff reviewed the efforts that the NRC, with the support of other Federal agencies, has conducted over the past 10 years to establish a voluntary integrated response program. The staff found that because industry has not fully supported this effort, the program has not achieved its full potential. Consistent with the discussion in COMSECY-13-0005,⁸ the staff plans to propose an option in the subsequent paper to the Commission related to whether rulemaking is needed to ensure full implementation by industry of the elements of the integrated response program.

Security Baseline Inspection Program Assessment

The staff assessed the security baseline inspection program in two phases. In the initial phase, the staff reviewed current staff activities and compiled both internal and external stakeholder input to identify areas likely to yield improvements and efficiencies. Based on the results of the initial phase of the assessment, the staff identified focus areas for a review of all security baseline inspection program procedures. The staff developed a charter⁹ to provide guidance and direction for an inspection procedure (IP) review team, composed of security inspectors and team leaders from headquarters and each regional office, to carry out the second phase of the assessment. The staff presented the objectives and focus areas for the IP review team during a public meeting on March 2, 2017, and obtained feedback from internal and external stakeholders.

In the second phase, the IP review team reviewed all of the security baseline inspection program procedures. The review focused on: (1) identifying redundancies; (2) identifying opportunities to streamline the inspection process; and (3) verifying that the IPs are consistent with the Commission direction on the concept of "high assurance." In so doing, the team considered specific recommendations provided by NEI in its January 26, 2017¹⁰, letter. The team developed a summary of its recommendations.¹¹ In its summary, the team identified several opportunities to eliminate redundant IP sample items and identified potential opportunities for increased inspection efficiency. The team also recommended revising the periodicity of one IP and recommended revisions to Inspection Manual Chapter 0609, Appendix E, "Security Significance Determination Process for Power Reactors."

As part of its IP review, the staff has identified specific changes to the FOF inspection process. The staff coordinated with both internal and external stakeholders, and identified several potential process improvements and efficiencies. For example, an extra week could be added between the planning and exercise portions of the FOF inspection; this would permit licensees and staff more time to prepare documentation for the exercises. Also, the Composite Adversary

⁸ COMSECY-13-0005, "Integrated Law Enforcement Response at Nuclear Power Plants" dated February 7, 2013 (ADAMS Accession No. ML12305A419) (OUO-SRI).

⁹ "Charter for the Security Baseline Inspection Program Assessment and Efficiency Review in Response to SRM-SECY-16-0073" dated February 28, 2017 (ADAMS Accession No. ML17144A256) (OUO-SRI).

¹⁰ NEI Letter to B. Holian, "Industry Recommendations Related to Memorandum, 'Staff Requirements – SECY-16-0073 – Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088,'" dated January 26, 2017 (ADAMS Accession No. ML17046A218).

¹¹ Summary of Security Inspection Procedure Review Team Recommendations dated August 21, 2017 (ADAMS Accession No. ML17191A402) (OUO-SRI).

Force (CAF) Director could join the NRC inspection team's planning week activities to streamline the scenario development process. Finally, the CAF team could arrive on-site 1 week earlier to allow training for the exercise week during normal work hours and minimize after-hours or weekend sessions.

The staff has a separate, ongoing initiative to review and update the security baseline inspection program significant determination processes (SDPs). The staff will incorporate the IP review team recommendations and ensure that the SDPs reflect both the concept of "high assurance" of adequate protection as described in SRM-SECY-16-0073, and an appropriate level of risk-informed decision-making when assessing findings. The staff is moving forward with revisions to the IPs and the associated SDPs using the current change management process. The staff would seek Commission approval or provide notification to the Commission (as appropriate per the Commission's direction in SRM-COMSECY-16-0022¹²) of any new or revised SDPs or IPs.

Force-on-Force Inspection Options

Section 170D of the Atomic Energy Act of 1954, as amended (AEA), requires that the NRC conduct security evaluations at licensed facilities, as the Commission considers to be appropriate, at least once every 3 years. These security evaluations are to assess the ability of the licensee's security force to defend against the applicable DBT. The AEA further requires that the security evaluations include FOF exercises (the number of exercises is not specified); that the exercises simulate security threats in accordance with the DBT to the maximum extent practicable; and that the Commission mitigate any potential conflict of interest that could influence the result of an exercise, as the Commission determines to be necessary and appropriate. Consistent with these requirements, each of the options set forth below would include at least one NRC-conducted FOF exercise during the NRC's triennial security evaluation of each nuclear power reactor licensee and maintains the NRC's role in conducting security evaluations at licensed facilities.

Based on its assessment of the security baseline inspection program, the staff has found that the program, including FOF, is effective. The staff has, however, identified potential efficiencies and improvements. As discussed above, the staff has assessed that revising the IPs and SDPs in the security baseline inspection program will result in some process improvements and efficiency gains for both the program as a whole and FOF exercises, specifically. In addition, the staff has identified an opportunity to adjust the FOF inspection portion of the program to realize additional improvements and efficiencies. Conceptual models of each of these options, including a more detailed discussion of their advantages and disadvantages, are provided in Enclosure 1. The staff would work with industry to identify the lead plants for implementing options 2 or 3, if approved by the Commission.

FOF Option 1 – Implement process improvements and maintain the current program of two NRC-conducted FOF exercises at each nuclear power reactor facility on a triennial basis

Option 1 represents the current FOF inspection program, with implementation of the process improvements discussed in the previous section. This option consists of a planning week, during which the NRC would plan two FOF exercises, and an exercise week, during which the NRC would evaluate licensee performance during the two exercises. The inspection program

¹² SRM-COMSECY-16-0022, "Proposed Criteria for Reactor Oversight Process Changes Requiring Commission Approval and Notification", dated May 12, 2017 (ADAMS Accession No. ML17132A359).

would continue under the currently established framework using IP 71130.03, “Contingency Response – Force-on-Force Testing,” and the current SDP, pending any revisions based on the SDP working group. The current FOF SDP uses the two NRC-conducted exercise results as inputs to assess overall licensee performance during FOF inspections.

The advantages of this option are that it provides the most program stability while implementing the IP review team recommendations, pursuing revisions to the SDP, and monitoring licensee performance during a period of resource reductions for both the NRC and industry. The disadvantages of this option are that it provides the smallest resource savings for both the NRC and industry and it does not take advantage of the opportunity to gain additional insights from assessing one FOF exercise from a different perspective (i.e., evaluation of defense-in-depth exercise or enhanced inspection of licensee-conducted exercises).

FOF Option 2 – Revise the FOF inspection program to include one NRC-conducted FOF exercise, followed by a defense-in-depth exercise if the licensee’s performance on the first FOF exercise is rated effective or a second NRC-conducted FOF exercise if it is not

Option 2 is a modification of the current inspection program and incorporates aspects of NEI’s defense-in-depth proposal outlined in attachment 3 to its January 26, 2017, letter. This option would maintain both the current planning and exercise weeks, modified as discussed in Option 1; however, the NRC inspection team would include a placeholder in the plan for the second exercise from which a defense-in-depth exercise would begin. During the exercise week, if the licensee’s performance in the initial exercise was evaluated as effective, the NRC would evaluate a defense-in-depth exercise instead of the second, full-scope FOF exercise. This exercise would consist of a CAF team complement, which would begin testing the licensee’s defenses at or within the protected area boundary at a pre-determined location. This would allow the NRC to reduce the scope of the exercise and focus the inspection on the internal layers of the licensee’s protective strategy. If the initial FOF exercise was evaluated as marginal, indeterminate, or ineffective, the inspection team would conduct a second NRC-conducted FOF exercise rather than a defense-in-depth exercise.

The advantages of this option are that it would provide an opportunity for the NRC to perform a specific evaluation of a licensee’s internal protective strategy. Also, for licensees that have an effective first FOF exercise, there may be greater resource savings, as outlined in Enclosure 1, for both the NRC and the licensee than those associated with option 1 because the defense-in-depth exercise would be designed to be shorter and would include fewer players. The primary disadvantage of this option is the risk of unintended consequences. By focusing on the internal strategy in the second exercise, the NRC may unintentionally encourage licensees with an effective external strategy to divert resources from maintaining that effective strategy to make unnecessary changes to their internal strategy solely for the purpose of performing well in the defense-in-depth exercise. Furthermore, this option would require resources to plan, coordinate, and carry out a second NRC-conducted FOF exercise even though it would not be needed if the first exercise is effective. Although NEI initially proposed the defense-in-depth exercise concept, NEI stated in a July 17, 2017, letter that it did not prefer this option.¹³

FOF Option 3 – Revise the FOF inspection program to include one NRC-conducted FOF exercise and an enhanced NRC inspection of a licensee-conducted annual FOF exercise

¹³ NEI letter to Marissa Bailey dated July 17, 2017, “Updated Industry Input on Options Being Considered for Force-on-Force Exercise Inspections” (ADAMS Accession No. ML17198B306).

Option 3 would maintain one NRC-conducted FOF exercise, modified as discussed in Option 1, and would include an enhanced NRC inspection and evaluation of a licensee-planned and conducted FOF exercise. Licensees currently conduct annual exercises for each security shift as part of the performance evaluation program required by Title 10 of the *Code of Federal Regulations* Part 73 Appendix B. The NRC's current inspection procedure for these licensee-conducted annual exercises focuses on an evaluation of the licensee's implementation of the training and qualification elements of its performance evaluation program, not the effectiveness of its protective strategy. Under this option, the NRC would conduct an enhanced inspection of a regularly scheduled licensee-conducted annual FOF exercise. Key differences between the NRC-conducted exercise and the licensee-conducted exercise include that the licensee would develop the exercise scenario, and the adversary force would be composed of licensee personnel. In addition to evaluating the performance of the licensee security force, the enhanced NRC inspection of the licensee-conducted exercise would review and evaluate the performance of the adversary force and the development and implementation of the exercise scenario.

The staff identified several advantages of this option. The NRC would be able to shorten both the FOF planning and exercise weeks because the NRC would plan and evaluate one exercise. Additionally, as with option 2, this option would provide staff with a different perspective through which to observe and evaluate the licensee's implementation of its protective strategy. Conducting an enhanced evaluation of a licensee-conducted FOF exercise would allow the NRC to better assess licensees' understanding of the tactics, techniques, and procedures that might be used by real world adversaries. Additionally improved licensee performance in the development and conduct of their annual exercises could facilitate licensees' self-assessment and identification of security issues to the benefit of their overall security programs.

Finally, this option would provide the staff with data that would inform a thorough consideration of potential future program changes, such as NEI's proposal to "ultimately [allow] licensees to prepare and conduct FOF exercises as a replacement for the NRC-conducted FOF exercises."¹⁴ Specifically, the staff would be able to assess whether licensee-conducted FOF exercises can mitigate conflicts of interest and realistically represent the DBT sufficient to meet the requirements of Section 170D of the AEA. Additionally, in SRM-SECY-16-0073 the Commission directed that, prior to any staff assessment of an industry proposal that the NRC observe and evaluate licensee-conducted FOF exercises rather than the NRC conducting FOF exercises, the Office of General Counsel complete a legal analysis on this matter. That legal analysis was provided to the staff and the Commission in February 2017, and is non-publicly available because it contains Official Use Only – Attorney/Client Privileged Information.

As noted in NEI's letter of July 17, 2017, Option 3 is the industry's preferred option. The staff identified some disadvantages for this option. Initially, this option could increase complexities with the scheduling process due to the need to avoid conflicts among multiple NRC inspections and licensee operations, and increase staff travel costs to inspect the licensee-conducted exercise. The continued use of the Reactor Programs System to coordinate inspection planning would help mitigate the scheduling issue and the reduction in resources achieved by eliminating the second NRC-conducted FOF exercise would help offset the travel costs associated with inspecting the licensee-conducted exercises. Further, consistent with the discussion in SECY-03-0208, the use of a licensee adversary force is subject to perceptions of conflict of

¹⁴ Id.

interest; however, the staff expects that any potential conflict would be mitigated by the NRC's independent evaluation of the licensee-conducted exercise.¹⁵

In summary, Option 3 would increase the efficiency of the FOF inspection program and allows the staff to evaluate the licensee's performance in a new manner without compromising the NRC's regulatory oversight responsibility.

COMMITMENT:

As discussed above, the staff has evaluated whether the NRC should provide credit for local, State, and Federal law enforcement in responding to a security event within the DBT and found that this would be a change in Commission policy. The staff is developing potential methodologies for providing credit and plans to submit a subsequent paper to the Commission that will discuss both credit for local, State, and Federal law enforcement in responding to a security event and recommendations for the integrated response program. This subsequent paper could address any improvements in FOF exercise realism that may stem from such credit.

RECOMMENDATIONS:

The NRC staff recommends that the Commission approve the staff's proposal to modify the FOF inspection program to include one NRC-conducted FOF exercise and an enhanced NRC inspection of a licensee-conducted annual FOF exercise (Option 3).

RESOURCES:

Resource needs for fiscal year (FY) 2018 and FY 2019 are included in the FY 2018 Current Estimate and FY 2019 Budget Request. Resources for FY 2020 and beyond will 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 the paper for resource implications and has no objection.

/RA/

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Enclosure:
As stated

¹⁵ SECY-03-0208, "Adversary for Force-on-Force Exercises at NRC-Licensed Facilities", dated December 3, 2003 (ADAMS Accession No. ML051020052).

SUBJECT: SECURITY BASELINE INSPECTION PROGRAM ASSESSMENT RESULTS
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