



PRDJO728

July 27, 2018
NRC:18:031

Ms. Anne Boland, Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Response to Confirmatory Order, EA-16-016 – Independent Consultant Review

Ref. 1: Letter, Patricia K. Holahan (NRC) to David M. Royer (AREVA Inc.), "AREVA Inc. Confirmatory Order," EA-16-016, August 4, 2016.

The NRC issued a Confirmatory Order (CO) to Framatome Inc. (Framatome, formerly AREVA Inc.) as a result of a successful Alternative Dispute Resolution (ADR) session (Reference 1).

One of the CO requirements was that Framatome engage an independent third-party consultant to conduct a review and provide a written assessment of Framatome's written import/export compliance program and training activities. Further, within 30 calendar days of the receipt of the final audit report, Framatome is required to share the consultant's written assessment with the NRC.

Enclosure 1 to this letter is the written assessment of Framatome's written import/export compliance program and training activities. This assessment was performed by Mr. William H. Ruland, currently of Steelhead Consulting, LLC, and former NRC Director, NRR Division of Safety Systems. As noted in the report, "No similar problems that led to the Confirmatory Order were identified during this assessment".

Enclosure 2 contains Framatome's response and applicable actions established for the recommendations provided within the written assessment by Mr. Ruland. Two primary weaknesses were identified during implementation of the actions of the CO. These were inattention to the timing details of two items in the CO and improvements needed in the content and documentation of the training for staff on import/export control. These two weaknesses have been addressed at the executive and senior management level. As noted in the enclosure, additional oversight has been implemented at the executive and senior management level to assure the timing details of NRC commitments and other significant actions are met. Additionally, training has been revised for select staff responsible for import/export activities of Framatome in accordance with the assessment recommendations. This select staff is currently being trained on the revised material and their training documented in our training archive records.

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YGO1
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NRC/OE

If you have any questions related to this submittal, please contact me by telephone at 434-832-3945, or by e-mail at Gary.Peters@framatome.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
K. M. Ramsey
W.H. Ruland – Steelhead Consulting, LLC
Project 728

Enclosures:

1. Letter, William H. Ruland (Steelhead Consulting, LLC) to David Royer (Framatome Inc.), "Review of Import/Export Compliance Program and Training Activities," July 2, 2018.
2. Framatome Response to "Review of Import/Export Compliance Program and Training Activities"

Enclosure 1

**Letter, William H. Ruland
(Steelhead Consulting, LLC) to
David Royer (Framatome Inc.),
“Review of Import/Export
Compliance Program and Training
Activities,” July 2, 2018.**

William H. Ruland
Steelhead Consulting, LLC
10800 Honeyfield Road
Williamsport, MD 21795-4045

July 2, 2018

Mr. David Royer
Vice President and General Counsel
Framatome, Inc.

Subject: Review of Import/Export Compliance Program and Training Activities

Dear Mr. Royer:

In accordance with the NRC's Confirmatory Order, dated August 4, 2016, and email direction from Mr. David M. Royer, Vice President and General Counsel, I, as an independent third party consultant, conducted a review and assessment of the above program. An exit was conducted by phone with you, Mr. Gary Peters, Director, Licensing and Regulatory Affairs, and staff, on June 18, 2018. The results of the assessment are attached.

On August 4, 2016, NRC issued a Confirmatory Order (CO) to Framatome (then AREVA), as a result of a successful Alternate Dispute Resolution (ADR) session. The ADR session was prompted by apparent violations of the NRC's import/export control regulations. No similar problems that led to the Confirmatory Order were identified during this assessment.

My report includes eleven recommendations for your staff to consider. The recommendations include several areas for improvement for the import/export control policies and procedures, and most significantly, to the conduct and management of training on import and export controls. Among the recommendations I made is that Framatome clearly identify management and staff responsible for import/export activities within Framatome who must receive the import/export control training. As it stands now, Framatome's training records do not clearly indicate which management and staff have this responsibility and, therefore, Framatome cannot demonstrate documented compliance with the CO's requirement that such management and staff have been trained.

A draft report was provided to obtain your comments. I had the final say on its contents.

Feel free to contact me if you would like to discuss this matter. I can be reached at steelheadllc@outlook.com.

Sincerely,

A handwritten signature in cursive script that reads "William H. Ruland".

William H. Ruland
Technical and Regulatory Consultant

cc via email:

Gary Mignogna – President and CEO

Gary Peters – Director, Licensing and Regulatory Affairs

Herb Winegard - Principal Counsel – Engineering and Projects - North America

Steven Bullock - Operations and Projects Manager – Legal Department

Gayle Elliott – Deputy Director, Licensing and Regulatory Affairs

Kim Jones – IB-A Training Specialist

Lisa Carpenter - Human Resources, Training & Development

Attachment 1— Assessment Report of Import/Export Program and Training Activities of Framatome Inc. (f/k/a) AREVA Inc.

Attachment 2—Interview Questions for Framatome Import/Export Audit

Assessment Report of Import/Export Program and Training Activities of Framatome Inc. (f/k/a AREVA Inc.)¹

1. Background

On August 4, 2016, NRC issued a Confirmatory Order (CO) to Framatome (then AREVA), as a result of a successful Alternate Dispute Resolution (ADR) session. The ADR session was prompted by apparent violations of the NRC's import/export control regulations. The first violation involved failure to submit quarterly reports to the NRC and the Department of Commerce (DOC) in accordance with 10 CFR 110.54(a)(1), of exports of certain components listed in Appendix A of Part 110 (and in Annex II of the Additional Protocol). The second violation involved Framatome's failure to apply for and obtain a specific license to export a Reactor Coolant Pump (RCP) without a motor to France.

In the CO, Framatome was ordered to perform eleven actions. Action eight required Framatome to "...engage an independent third-party consultant to conduct a review and provide a written assessment of AREVA's (now Framatome) written import/export compliance program and training activities." This report is the written assessment required by Action eight.²

2. Scope of Review

The review started on April 19, 2018, when the contract was approved and email direction was given to the consultant to start.³ An exit was

¹ Throughout this report reference to Areva should be understood to be reference to Framatome and vice versa.

² The CO required that the consultant, "...possess NRC regulatory experience." The consultant performing the review and writing the assessment has over 30 years of NRC regulatory experience, both in inspection and licensing, in the regions and in NRC headquarters. The consultant's last position in the NRC was as Director, Division of Safety Systems, Office of Nuclear Reactor Regulation, retiring in January 2013.

³ Item No. 8 of the CO required that no later than 60 days following development of the procedures, to engage an independent auditor. The final procedure that was updated, "Export Control Screening", PR-NA-CORP-SS-LEG-00006, was approved on December 1, 2016. I was not engaged until April 19th, 2018, 140 days later. Also, per CO action item four, which stated that, "Within 12 months, Areva will develop and/or update written procedures related to NRC requirements contained in 10 CFR Parts 75 and 110." The procedure was completed—approved—on December 1, 2017, about three months beyond 12 months.

conducted by phone with Mr. David Royer, General Counsel, Mr. Gary Peters, Director, Licensing and Regulatory Affairs, and staff, on June 18, 2018. The review included:

- a. Review of selected exports to determine whether or not any additional violations occurred similar to the RCP and failure to report in accordance with the Additional Protocol (AP);
- b. Review of quarterly and annual reports made in accordance with the Additional Protocol;
- c. A review of updated/developed procedures to insure they were of sufficient scope;
- d. Review the training materials that were used to perform the training required by the CO;
- e. Review that management and staff were identified that were required to be trained, and that those so identified were trained for the:
 - i. Initial training (CO action five);
 - ii. Annual refresher training (CO action six); and
 - iii. New staff training (CO action seven);
- f. Interviews of 13 staff on the training that they received; (see Attachment 2, Interview Question Sheet); and
- g. Searched WebCAP⁴ CRs for evidence that staff were documenting and appropriately resolving import/export control issues.

3. Results of Review

- a. Selected review of exports
 - i. The consultant reviewed a sample of “Off-Plant Shipping Requests”, “Transportation Shipping Checklists”, and other associated documents that were part of the shipping documents to determine if an export occurred that should have required a specific license.
 - ii. Results—No errors were identified.

⁴ WebCAP is the Framatome Corrective Action Program software used to improve their business performance by identifying, processing, correcting and preventing recurrence of issues.

- b. Review of quarterly and annual reports made IAW the AP—the consultant reviewed the recent reports. They were made on time and no discrepancies were noted.
- c. Review of updated/developed procedures and program
 - i. Overall scope of the policy, procedures, and program
 - 1. CO action 4 required that, “Within 12 months, AREVA will develop and/or update written procedures related to NRC requirements contained in 10 CFR Parts 75 and 110.” (Note: see footnote 3). The consultant listed the operational requirements contained in the above regulations and compared the contents of the procedures against those requirements. No gaps were identified.
 - 2. The Export Control Officer (ECO) makes the decision on compliance with import and export regulations without apparent direct or indirect oversight. This complies with the Framatome program. The consultant found no evidence that this decision making process is not functioning now. One violation that led to the Confirmatory Order was based on the current ECO’s interpretation of NRC regulations.⁵ The following recommendations are made to minimize the chance of similar future errors:

Recommendation 1: To strengthen the program, a periodic third party audit or similar additional oversight should be added. If such oversight is implemented, it should be included in the procedures.

Recommendation 2: To make any additional oversight more effective and efficient, Framatome should require in its procedures that a log of relevant exports be

⁵ Framatome did not apply for and obtain a specific license prior to exporting a reactor coolant pump (RCP) to France based on the ECO’s interpretation of the regulations that an RCP lacking a motor is only a part of an RCP and, therefore, did not require a specific license.

maintained by the Export Administrators.

3. The ECO reported that he regularly consults the relevant regulatory agencies, i.e., DOC, DOE, and NRC via their respective websites and phone calls with agency personnel. He also receives periodic updates via email to keep him abreast of upcoming changes.
 4. Framatome's Policies and Procedures System, known as PoPS, is used by Framatome staff to manage and access all procedures, policies, and implementing documentation. The PoPS main webpage includes a pop up caution reminder for staff that the content of the documents could come under export control. Framatome reported that the pop-up caution appears the first time a person views the page in a month.
 5. The consultant asked what information regarding export control, if any, is provided to Framatome staff prior to traveling overseas. Framatome reported that the Security & Loss Prevention (SLP) team, which reports to the General Counsel, provides written and verbal instructions to employees traveling overseas which includes cautions about the protection of information (including in electronic form on computers and other devices). The SLP website to which travelers are also directed also has information /training specifically addressing export control and travel.
- ii. Export Control Policy, PO-NA-CORP-SS-LEG-00005
1. The consultant reviewed the policy to determine its adequacy. The policy states that compliance is the responsibility of all personnel and that they shall comply using proper assurances. The term export was appropriately defined very broadly.

2. Several areas in the Policy need improvement:

- a. Import/Export Administrators were called out in section 4.9. However, the Policy does not address the qualifications and responsibilities of the Administrators, if any. Additionally, Framatome does not currently maintain a list of the Administrators.
- b. Section 4.11, Export Control Training, states that periodic training programs shall be provided. No description, frequency or other details of the training were addressed in the Policy.
- c. Section 4.12, Export Assessment, states that the company shall conduct routine self-assessments. As described to the consultant, self-assessments were routine checks by the ECO as part of his normal activities. The company did not maintain records of the self-assessments.

Recommendation 3: Revise the Export Control Policy to address above-identified weaknesses.

- iii. The Export Control Screening procedure, PR-NA-CORP-SS-LEG-0006, provides sufficient instruction to screen exports to determine license and/or reporting requirements , when taken together with the following additional written procedures:
 1. Instructions for Preparing the Quarterly IAEA AP Export Report.
 2. Instructions for Preparing the Advance Notice of Export Shipment to the NRC.
 3. Instructions for Preparing Export/Import Applications for Nuclear Equipment and Material.
 4. Instructions for Preparing the Yearly IAEA AP Facility Report. Note that Section 4.3 of this procedure, version 1.0, states that "Any significant changes should be

reported.”

Recommendation 4: Framatome should provide additional information about what is significant, and change the “should” to “shall.”

- iv. Several procedures and agreements with outside organizations are in effect to support export control compliance. For example, the ECO signed an agreement with AREVA GmbH and AREVA SA—foreign entities of AREVA—to agree to notify AREVA (now Framatome) of a transfer or re-transfer of U.S. technology such that Framatome can seek permission of DOE for prior approval of the transfer.

d. Training Materials Review

The consultant reviewed the three training material packages (PowerPoint presentations) used by the ECO for the required training as specified in CO action items 5, 6, and 7. Comments regarding the training materials are as follows:

- i. The initial written training outlined the import and export control requirements and emphasized and reinforced the NRC compliance expectations, with one exception. The written training materials did not address the requirement contained in 10 CFR 110.7a(a), Completeness and Accuracy of Information, which is an expectation of the NRC. Framatome reported that this regulation is covered in other training within the Fuels Business Unit.

Recommendation 5: Include training on 10 CFR 110.7a(a), Completeness and Accuracy of Information, in future training.

- ii. Annual refresher training information was very similar to the initial training. Since all procedures were updated or written before the initial training, there was no training required for

updated of developed written procedures.

- iii. No specific training was developed for initial training of new management and staff. The ECO reported that Framatome was going to use the refresher training course as the initial training course for new staff. The consultant agreed that no separate training package was required to be developed for new staff. However, the consultant believes that the intent of CO action seven was to train new staff early in their tenure to prevent errors between the time they arrive and when the refresher training was given. Framatome has not provided such training.

Recommendation 6: As part of on-boarding/promotion process, there should be a requirement that export control training be provided to new managers and staff within 30 days of assignment, or prior to their first activity associated with import/export, whichever comes first.

- iv. While the training content generally met the requirements of the CO, there was no learning objective that addressed what were the key take-aways for employees to support compliance with import/export controls.

Recommendation 7: Amend training materials to include Key Learning Objectives so employees understand the key take-aways from the import/export training.

e. Training attendance

The consultant reviewed training records to determine whether or not training was conducted, "...with management and staff responsible for import/export activities within AREVA..." as required by CO actions 5, 6, and 7. In addition, those CO actions required that, "AREVA will maintain documentation of management and staff that

attended such training.” The consultant made the following observations concerning training attendance:

- i. For the initial training, no criteria were developed about who should take the training other than the words used in the CO. It was left to individual supervisors to determine who should attend. Framatome provided the consultant a list with 296 names who received initial training as recorded in Portfolio, Framatome’s training record system, and who had taken the training prior to October 3, 2016, meeting the date required by the CO. Framatome reported that some staff were later added to receive the training, as reported by Framatome training personnel but the training occurred after October 3rd.
- ii. For the refresher training, training staff reported that they were not provided with criteria for who should take the training. The training was a video recorded by the ECO. Since no criteria were ever supplied, fewer staff took the refresher training in 2017 and, thus far, in 2018. Framatome training staff reported that 27 staff were trained in 2017 and 29 were trained so far in 2018.
- iii. As described above, Framatome maintained documentation of management and staff who received the initial training and refresher training. They did not develop written criteria or other guidelines to determine which management and staff should receive the training. The ECO relied on individual supervisors within Framatome to determine who should attend the training. As a result, the consultant could not confirm whether the list of training attendees included all managers and staff responsible for import/export activities within the company.

Recommendation 8: Identify and document management and staff responsible for import/export activities within Framatome and/or develop specific criteria for management and staff that should attend the training and provide the training.

f. **Staff Interviews**—To gauge the knowledge of Framatome’s staff related to import/export activities, the consultant conducted employee interviews. Thirteen interviews were conducted, all but one by telephone, to understand what staff recalled from the training. The interviewees were selected using the list of those who took the initial training. Due to the small sample, no general conclusion should be drawn from the results. With that caveat:

- i. Few of the employees interviewed remembered whether they had received refresher training. Several staff went back and looked at their training Portfolio to see if they had received refresher training. Only one reported that they had received it.
- ii. There was a good understanding of the broad definition of what is an export.
- iii. Two engineers said that they needed to be careful when talking to company engineers when they were overseas.
- iv. Several individuals said that they had little or no involvement with import/export controls.

Recommendation 9: Consider whether or not a quiz at the end of the training is appropriate to check understanding and improve information retention.

g. **WebCAP Condition Reports (CRs)**—The consultant reviewed several CRs and one Spot Observation that were written about import/export controls. Staff interviewed about those CRs were knowledgeable and described adequate resolution of the issues. Spot Observation 2017-0441 was written to document a concern about how someone could obtain unauthorized information contrary to the export control rules. A Spot Observation is not a CR but only documents a concern, or in this case, a possibility that under other circumstances, a violation could occur. The information was also forwarded to the ECO via email. Neither a response to the email nor documentation of an answer to the concern was provided in WebCAP.

Recommendation 10: Review this Spot Observation and reply to the originator on the resolution of the comment.

- h. Summary—The consultant's review revealed several areas of weakness in the written procedures, training materials and documentation which need to be addressed in accordance with the recommendations above. Completion of these recommendations will strengthen Framatome's compliance program and, in some cases, achieve compliance with the CO.

Recommendation 11: Address areas of weakness and non-compliance with the Confirmatory Order using the Corrective Action Program and the appropriate evaluation tools.

Attachment 2

Interview Questions for Framatome Import/Export Audit

Name:

Job Title:

Years in the position:

Role in Import/Export activities:

Describe training that you have had regarding import/export controls both prior to and after 2016:

☐ Initial training 2016 ☐ Refresher 2017 ☐ Refresher 2018

What do you remember about the training?

What procedures or policies govern the import/export activities?

What is an export?

What are the NRC's compliance expectations related to import/export activities?

Anything else you would like to say or that I should know to make my audit more effective?

Enclosure 2

Framatome Response to “Review of Import/Export Compliance Program and Training Activities”

Recommendation 1:

To strengthen the program, a periodic third party audit or similar additional oversight should be added. If such oversight is implemented, it should be included in the procedures.

Framatome Response to Recommendation 1:

Policy PO-NA-CORP-SS-LEG-00005, "Export Control," currently requires oversight in the form of self-assessments of its export control functions. The policy is in the process of being revised to strengthen the self-assessment process by addressing their frequency and documentation requirements.

This action has been documented in our corrective action program (WebCAP) and is scheduled for completion in August 2018.

Recommendation 2:

To make any additional oversight more effective and efficient, Framatome should require in its procedures that a log of relevant exports be maintained by the Export Administrators.

Framatome Response to Recommendation 2:

Procedure PR-NA-CORP-SS-LEG-00006, "Export Control Screening," is being revised to require maintenance of a single list of all international exports.

This action has been documented in our corrective action program (WebCAP) and is scheduled for completion in August 2018.

Recommendation 3:

Revise the Export Control Policy to address identified weaknesses:

- a. **Import/Export Administrators were called out in section 4.9 of Export Control Policy, PO-NA-CORP-SS-LEG-00005. However, the Policy does not address the qualifications and responsibilities of the Administrators, if any. Additionally, Framatome does not currently maintain a list of the Administrators.**
- b. **Section 4.11 of the referenced Policy, Export Control Training, states that periodic training programs shall be provided. No description, frequency or other details of the training were addressed in the Policy.**
- c. **Section 4.12 of the referenced Policy, Export Assessment, states that the company shall conduct routine self-assessments. As described to the consultant, self-assessments were routine checks by the Export Control Officer (ECO) as part of his normal activities. The company did not maintain records of the self-assessments.**

Framatome Response to Recommendation 3:

Policy PO-NA-CORP-SS-LEG-00005, "Export Control," is being revised as follows:

- a. Qualifications and responsibilities of the Administrators are being added to Section 4.9 of the policy. Additionally, a list of Administrators has been identified and documented on an Export Control SharePoint.
- b. Section 4.11 of the policy is being revised to add the description of the content of the training, frequency, and other details.
- c. Section 4.12 of the policy is being revised to strengthen the self-assessment process, to address the frequency and documentation requirements of self-assessments.

This action has been documented in our corrective action program (WebCAP) and is scheduled for completion in August 2018.

Recommendation 4:

Framatome should provide additional information in the Export Control Screening procedure, PR-NA-CORP-SS-LEG-00006, about what is significant, and change the "should" to "shall."

Framatome Response to Recommendation 4:

- a. In the Export Control Screening procedure, PR-NA-CORP-SS-LEG-00006, section 4.0 states: "Accordingly, all Company business units should consult with the Company Import/Export Administrators or the Export Control Officer when engaging in any type of export transaction..." The "should" will be changed to "shall."
- b. Procedure E10-06-003, version 1.0, Instructions for Preparing the Yearly IAEA AP Facility Report, Section 4.3, also states, "Any significant changes should be reported." Framatome will provide additional information about what is significant, and change the "should" to "shall."

This action has been documented in our corrective action program (WebCAP) and is scheduled for completion in August 2018.

Recommendation 5:

Include training on 10 CFR 110.7a(a), "Completeness and Accuracy of Information," in future training.

Framatome Response to Recommendation 5:

The revised training presentation includes the requirements of and reference to 10 CFR 110.7a(a).

Recommendation 6:

As part of on-boarding/promotion process, there should be a requirement that export control training be provided to new managers and staff within 30 days of assignment, or prior to their first activity associated with import/export, whichever comes first.

Framatome Response to Recommendation 6:

Policy PO-NA-CORP-SS-LEG-00005 is being revised to require new managers and staff be provided export control training within 30 days of assignment, or prior to their first activity associated with import/export, whichever comes first.

This action has been documented in our corrective action program (WebCAP) and is scheduled for completion in August 2018.

Recommendation 7:

Amend training materials to include Key Learning Objectives so employees understand the key take-aways from the import/export training.

Framatome Response to Recommendation 7:

The revised training presentation includes "Key Learning Objectives." Additionally, key take-aways were added throughout the presentation material where appropriate.

Recommendation 8:

Identify and document management and staff responsible for import/export activities within Framatome and/or develop specific criteria for management and staff that should attend the training and provide the training.

Framatome Response to Recommendation 8:

A list of management and staff responsible for import/export activities has been developed and is archived in an Export Control SharePoint. This list will be periodically reviewed by the Export Control Officer and Framatome management to ensure it stays updated. This select staff is currently being trained on the revised material and their training documented in our training archive records.

Recommendation 9:

Consider whether or not a quiz at the end of the training is appropriate to check understanding and improve information retention.

Framatome Response to Recommendation 9:

In lieu of a quiz, detail was added to the training material that is appropriate for improvement of information retention. This includes Key Learning Objectives and Key Take-Aways. Future self-assessments will conduct spot-checks of knowledge retention of the trained employees to evaluate if a quiz should be added.

Recommendation 10:

Review Spot Observation 2017-0441 and reply to the originator on the resolution of the comment.

Framatome Response to Recommendation 10:

A Spot Observation was submitted by an administrator of our document control system about the possible transfer of documents outside the US. A response was submitted to the originator of the Spot Observation on the resolution of the comment. The originator commented on the resolution and was in agreement with the response.

Recommendation 11:

Address areas of weakness and non-compliance with the Confirmatory Order using the Corrective Action Program and the appropriate evaluation tools.

Framatome Response to Recommendation 11:

Two primary weaknesses were identified during implementation of the actions from the CO. The first weakness was inattention to the timing details of the CO. Corrective actions taken for this weakness include:

- a. Management oversight and approval from an independent organization (Licensing and Regulatory Affairs) has been implemented for all actions associated with the recommendations from the written assessment and from the initial CO.
- b. A Regulatory Action List has been created and implemented as part of the agenda of the CEO Executive Staff Meeting on a monthly basis. Included in this list are all upcoming NRC Commitments and other significant actions.

The second weakness identified improvements needed in the content and documentation of the training for staff on import/export control. The training presentation has been revised and provided to the select staff on import/export control in accordance with the recommendations of the assessment. Additionally, the applicable staff responsible for import/export control processes has been identified and documented.

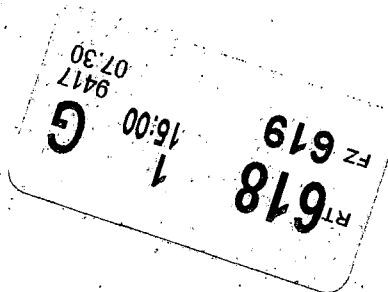
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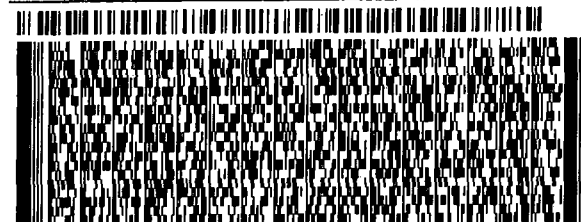
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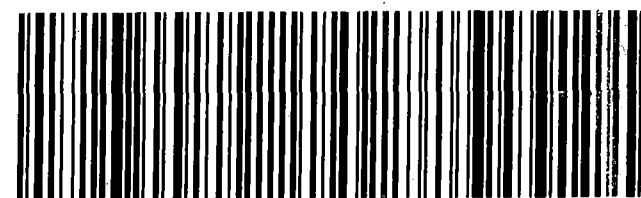


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MON - 30 JUL 3:00P
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Part # 156148-434 RIT EXP 03/19