



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

August 16, 2019

EA-18-151

Dr. K. P. Singh  
President and CEO  
Holtec International  
Krishna P. Singh Technology Campus  
1 Holtec Boulevard  
Camden, NJ 08104

SUBJECT: HOLTEC INTERNATIONAL – U.S. NUCLEAR REGULATORY COMMISSION  
FOLLOW-UP INSPECTION REPORT NO. 07201014/2019-201 AND NOTICE  
OF VIOLATION

Dear Dr. Singh:

This letter refers to a supplemental inspection using the U.S. Nuclear Regulatory Commission's (NRC's) Inspection Procedure (IP) 92702, "Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders," conducted on June 10-13, 2019, at your facility in Camden, New Jersey. The inspection included in-office reviews of information provided by your staff from January 3, 2019, through May 23, 2019.

The purpose of the inspection was to review corrective actions taken by Holtec International (Holtec) in response to the violations that involved: (1) failure to establish adequate design control measures as a part of the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the functions of the structures, systems, and components which are important to safety as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 72.146(a), and (2) failure to perform 10 CFR 72.48 evaluations prior to implementing proposed changes and failure to obtain certificate of compliance (CoC) amendments pursuant to 10 CFR 72.244 as required by 10 CFR 72.48.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of an NRC requirement occurred. The violation is cited in the Notice of Violation (Enclosure 2) and the circumstances surrounding it is described in detail in the subject inspection report (Enclosure 1). The Violation is being cited because it was identified by the NRC. The NRC team discussed the preliminary inspection findings with members of your staff on June 14, 2019, at the conclusion of the inspection. A final exit briefing was conducted telephonically with Mr. Mark Solar, Vice President Quality, and members of your staff on July 2, 2019.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

**/RA Jon Woodfield Acting for/**

Christian Araguas, Chief  
Inspections, and Operations Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket Nos. 72-1014, 72-1040,  
and 72-1032

Enclosures:

1. NRC Inspection Report  
No. 07201014/2019-201
2. Notice of Violation

SUBJECT: HOLTEC INTERNATIONAL – U.S. NUCLEAR REGULATORY COMMISSION  
FOLLOW-UP INSPECTION REPORT NO. 07201014/2019-201 AND NOTICE  
OF VIOLATION, DOCUMENT DATE: August 16, 2019

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**U.S. NUCLEAR REGULATORY COMMISSION  
Office of Nuclear Material Safety and Safeguards (NMSS)  
Division of Spent Fuel Management (DSFM)**

**Inspection Report**

Docket: 72-1014, 72-1040 and 72-1032

Report: 07201014/2019-201

Certificate Holder: Holtec International  
Krishna P. Singh Technology Campus  
1 Holtec Boulevard  
Camden, NJ 08104

Inspection Location: Holtec International  
Krishna P. Singh Technology Campus

Inspection Dates: June 10-13, 2019

Inspection Team: Earl Love, Senior Transportation & Storage Safety Inspector  
NMSS/DSFM/Inspections and Operations Branch

Matthew Learn, Reactor Engineer, Materials CNT-ISFSI DECOMM  
Branch, RIII

Jason Piotter, Senior Mechanical Engineer  
NMSS/DSFM/Containment, Structural and Thermal Branch

Approved by: Christian Araguas, Chief  
Inspections and Operations Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

**U.S. NUCLEAR REGULATORY COMMISSION  
Office of Nuclear Material Safety and Safeguards  
Division of Spent Fuel Management**

**EXECUTIVE SUMMARY**

**Holtec International  
NRC Inspection Report 72-1014/2019-201**

During the period of June 10-13, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed a team follow-up inspection at Holtec International's corporate facility located at Krishna P. Singh Technology Campus, Camden New Jersey.

The NRC performed this follow-up inspection to determine if: (1) the root and contributing causes of the significant performance issues were understood, (2) the extent of condition and extent of cause for the significant performance issues were identified, (3) the corrective actions taken to address and preclude repetition of significant performance issues were prompt and effective, and (4) the corrective action plans direct prompt actions to effectively address and preclude repetition of significant performance issues. Our initial inspection was documented in NRC letter "Inspection Report 07201014/2018-201, Holtec International," (NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML18306A853) and finalized in NRC letter "Holtec International – Notice of Violation; Inspection Report No. 07201014/2018-201 Division of Spent Fuel Management," (ADAMS Accession No. ML19072A128).

The NRC determined that completed or planned corrective actions were comprehensive and sufficient to address the performance issues that led to the previously identified violations. However, during the NRC's review, the inspectors identified one violation of NRC requirements relating to two 72.48 evaluations of similar subject. The violation is described in detail in the inspection report (Enclosure 1) and cited in the Notice of Violation (Enclosure 2) and is being cited because it was identified by the NRC.

As summarized in Table 1 below, one Severity Level IV Violation of NRC requirements was identified.

**Table 1  
Summary of Inspection Findings**

Regulatory Requirement 10 CFR Section	Subject	Number of Findings	Type of Finding	Report Section(s)
72.48	Changes, tests, and experiments	1	SLIV Violation	1.5.2

## REPORT DETAILS

### Background

The U.S. Nuclear Regulatory Commission (NRC) performed a routine inspection at Holtec International (Holtec) corporate office in Camden, New Jersey from May 14-18, 2018, with continued in-office review through November 26, 2018. The inspection assessed the adequacy of Holtec's activities with regard to the design of spent fuel storage casks with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-level Radioactive Waste, and Reactor-related Greater Than Class C Waste."

The NRC determined that violations of regulatory requirements occurred. This determination was based on information developed during the NRC inspection, information you provided in your responses to the inspection report, and information you provided during and after a Predecisional Enforcement Conference.

These violations involved:

- (1) Failure to establish adequate design control measures which are important to safety as required by 10 CFR 72.146(a). Specifically, failure to establish adequate design control measures and obtain NRC approval prior to modifying multi-purpose canisters (MPC) with four-inch stainless steel stand-off pins deemed potentially safety significant. The NRC considered this Violation to be of moderate safety significance and categorized the violation at Severity Level III, in part, because the design change was outside design specifications to the extent that a detailed evaluation was required to determine its operability, and
- (2) Failure to perform 10 CFR 72.48 evaluations prior to implementing proposed changes and failure to obtain certificate of compliance (CoC) amendments pursuant to 10 CFR 72.244 as required by 10 CFR 72.48. The inspection cited a Severity Level IV violation with three examples of failing to follow NRC's requirement to adequately perform a 10 CFR 72.48 evaluation prior to implementing proposed changes and failing to obtain CoC amendments pursuant to 10 CFR 72.244. The 72.48 violation resulted in conditions as having very low safety significance. The NRC has determined that escalated enforcement was not warranted for this violation.

### **1 Follow-up on Traditional Enforcement Actions (Inspection Procedure 92702)**

#### **1.1 Inspection Scope**

The purpose of the inspection is to conduct a follow-up inspection to assess Holtec's short and long term corrective actions and actions to prevent recurrence to the subject violations. The NRC performed this follow-up inspection to determine if: (1) the root and contributing causes of the significant performance issues were understood, (2) the extent of condition and extent of cause for the significant performance issues were identified, (3) the corrective actions taken to address and preclude repetition of significant performance issues were prompt and effective, and (4) the corrective action plans direct prompt actions to effectively address and preclude repetition of significant performance issues. Our initial inspection was documented in NRC letter "Inspection Report 07201014/2018-201, Holtec International," (ADAMS Accession No. ML18306A853) and finalized in NRC letter "Holtec International – Notice of Violation;

Inspection Report No. 07201014/2018-201 Division of Spent Fuel Management,” (ADAMS Accession No. ML19072A128).

The NRC reviewed Holtec’s corrective action program, implementing documents, and resultant quality issue reports to ensure that the certificate holder, identified the conditions adverse to quality in the Notice discussed above, and took action to adequately correct the conditions. Additionally, in the case of the significant conditions adverse to quality, that measures were taken to ensure that the cause of the condition was determined and corrective action were taken to preclude repetition. The NRC noted your performance of reviews of findings from internal audits and surveillances in support of determinations on the repetitive and generic nature of the violations and the effectiveness of your programs.

## 1.2 Inspection Procedures/Regulatory Guide Used

IP92702	“Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders,” dated 01/10/08
IP60851	“Design Control of ISFSI Components,” dated 01/16/08
IP60857	“Review of 10 CFR 72.48 Evaluations,” dated 10/24/07
RG 3.72	“Guidance for Implementation of 10 CFR 72.48, Changes, Tests, and Experiments, dated March 2001

## 1.3 Persons Contacted

The team held an entrance meeting with Holtec personnel on June 10, 2019, to present the purpose and scope of the NRC follow-up inspection. On July 2, 2019, the inspection team leader conducted a telephone exit with Holtec’s Vice President of Quality, Mr. Mark Soler.

### Holtec Personnel

M. Soler, Vice President Quality  
S. Anton, Vice President Engineering & Licensing  
K. Manzione, Licensing Manger  
C. Bullard, Director of Engineering Mechanics  
P. Chaudhary, Senior Vice President of Operations  
D. Mitra Majumdar, Senior Director of Engineering Analyses

## 1.4 List of Acronyms Used

ADAMS	Agencywide Documents Access and Management System
ASME	American Society of Mechanical Engineers
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
DSFM	Division of Spent Fuel Management
ECO	Engineering Change Order
FSAR	Final Safety Analysis Report
HI-STORM UMAX	Holtec International Storage Module Underground Maximum Capacity
Holtec	Holtec International

IP	Inspection Procedure
NMSS	Nuclear Material Safety and Safeguards
Notice	Notice of Violation
MPC	Multipurpose canister
QI	Quality Issues
SL	Severity Level
SONGS	San Onofre Nuclear Generating Station
TS	Technical Specification
USNRC	U.S. Nuclear Regulatory Commission
VVM	Vertical Vent Module

## 1.5 Observations and Findings

### 1.5.1 Severity Level III: Design Control

Holtec documented the associated violation as significant conditions adverse to quality in quality issue (QI) form QI-2418. The NRC noted that the primary root cause of the violation for failure to establish adequate design control measures and obtain NRC approval prior to modifying multi-purpose canisters (MPC) with four-inch stainless steel stand-off pins was a deficiency in the design change process which did not ensure manufacturing (e.g., canister rolling and peening), handling, and inspection processes and potential for lateral loads that may occur, to structurally qualify the stand-off pins, were considered and evaluated.

The NRC determined that Holtec identified and implemented appropriate short term corrective actions to (1) assess all MPC's fabricated, delivered and loaded with shim standoffs; (2) analyze licensees loaded units to ensure they are in safe condition; (3) analyze basket shim stand-off for seismic and impact loading; (4) perform inspections of all non-loaded units to identify necessary actions on a case-by-case basis; (5) eliminate the shim stand-off design from MPC-89 licensing and MPCs-37, 68 and 68M fabrication drawings; (6) notify customers that have delivered or loaded systems, and (7) submission of an amendment to the HI-STORM UMAX CoC No. 1040.

In addition, the NRC determined that your staff identified and implemented appropriate long term corrective actions and methods to prevent recurrence, by completion of (1) lessons learned assessment to cover evaluation of design change from a manufacturing and licensing/analysis standpoint and to address issues within the corrective action program; (2) revising engineering change orders (ECO) and drawing review checklists to include questions on impacts to components during fabrication activities; (3) development of written instructions for process change risk evaluations; (4) development of on-the-job training to include shop tours and review of standard manufacturing processes; (5) evaluation of corrective actions initiated in 2018 for design changes that may not have been appropriately evaluated; (6) development of an ECO surveillance process for technical discipline managers to assess whether design changes were appropriately evaluated; (7) training shop personnel on reviewing travelers and other written instructions prior to performing work; (8) training shop personnel on issues identified with installation of the shims; and (9) evaluating the design change process within technical disciplines to determine areas for improvement.

The NRC noted for the HI-STORM 100 canister cask systems placed in services with the shim standoff design at Grand Gulf Nuclear Station, Vermont Yankee Nuclear Power Station and Columbia Generating Station that Holtec's thermal analysis, under a hypothetical scenario wherein all the shim standoffs fail, MPC-68M canisters at design



basis heat loads meet the thermal requirements in the FSAR, as applicable. For the Holtec International Storage Module Underground Maximum Capacity (UMAX) canister storage system, the only site that was impacted was San Onofre Nuclear Generating Station (SONGS). Holtec evaluated thermal performance of UMAX canister storage system for a hypothetical scenario of shim standoff failure and concluded, MPC-37 loaded into a UMAX canister storage system will meet the FSAR limits under long term storage condition. In addition, the NRC noted that Holtec performed structural analysis and concluded performance of the shim standoffs, under three dynamic simulations with varying input conditions, withstand design basis evaluation seismic loading without a structural failure.

The NRC noted, Holtec determined that the appropriate actions and conservative approach for the (4) SONGS MPC-37 canisters was to submit CoC No. 1040, Amendment No. 4. This change includes a version of the MPC-37, known as Type 1 in the HI-STORM UMAX licensing basis. The MPC-37 Type 1 assumes the periphery basket flow holes are closed by design options and/or a condition that causes restricted flow through the shims. The NRC noted that QI-2418 provided a link to this submittal allowing for shim standoffs at SONGS.

The NRC determined that Holtec's staff's causal evaluations to address the previously issued design control Severity Level III violation was adequate and that measures were taken to ensure that the root cause of the condition was determined and corrective actions were taken to preclude repetition. This closes Violation 072-0721014/2019-001-01 (10 CFR 72.146(a), "Failure to establish adequate design control measures which are important to safety and obtain NRC approval prior to modifying multi-purpose canisters (MPC) with four-inch stainless steel stand-off pins deemed potentially safety significant."

#### 1.5.2 Severity Level IV: 72.48 Evaluation

The NRC noted Holtec documented the associated violation as conditions adverse to quality in quality issue form QI-2471 and that contributing causes of the violation for failure to follow NRC's requirement to adequately perform 10 CFR 72.48 evaluations prior to implementing proposed changes and failing to obtain CoC amendments pursuant to 10 CFR 72.244, were considered, evaluated and comprehensive. The NRC determined that your staff identified and implemented corrective actions by (1) lessons learnt training of licensing staff; (2) enhancement of the 10 CFR 72.48 process including procedure and guidance documentation; (3) revising affected 10 CFR 72.48 screenings and initiation of evaluations; (4) submission of Amendment to HI-TRAC VW Version V, CoC; and (5) rework of a MPC threaded outer top cover lift hole.

The NRC noted that for the four (4) HI-STORM UMAX and sixteen (16) HI-STORM 100 MPC-37 and MPC-68M canister cask systems placed into service at SONGS and Vermont Yankee Nuclear Power Station, respectively, that Holtec updated previous 72.48 evaluations (current Nos. 1319R2 and 1321R1) from screenings to include written evaluations to provide technical disposition for accepting detached shim standoffs as they relate to maintaining vertical positioning of the hollow basket shims during all normal, off-normal, and accident conditions and that the addition of the shim standoffs may be implemented without obtaining an amendment to the license or CoC.

The NRC determined that Holtec's causal evaluations and corrective actions taken to address the previously issued 72.48 violation was adequate. This closes Violation 072-0721014/2019-001-02 (Failure to perform 10 CFR 72.48 evaluations prior to implementing proposed changes and failure to obtain certificate of compliance (CoC) amendments pursuant to 10 CFR 72.244 as required by 10 CFR 72.48.)

The NRC reviewed a sample of 72.48's and noted Holtec performed two separate canister scratch/gouge 72.48 evaluations, one to address the 5/8-inch thick shell wall (72-1384, Revision 1) and the other to address the 1/2-inch thick shell wall (72.48 -1357, Draft Revision 3) canister configurations. Both configurations are applicable to the HI-STORM UMAX canister storage system and both 72.48 evaluations concluded that the scratch/wear potential from downloading would result in local structural discontinuities as peak stresses. The NRC noted the evaluations failed to demonstrate an estimation of gouge sizes was achieved through any identified methodology and that no evaluation was provided to compare the estimated gouge sizes to acceptance criteria for minimum wall thickness, as identified in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III (or Section XI). The current regulatory compliance is that the MPC meet ASME Section III. According to Holtec, the applicable stress intensity limits of ASME Section III for pressure retaining boundary are unaffected by the presence of scratches and defaulted to minimum wall thickness to meet the design internal pressure for the canister as 0.216" (per NB-3324 of the ASME Code); leaving a substantial thickness reserve ( $> 0.25$ ") for imperfections such as scratches. However, the NRC noted absence of a technical basis and analysis in support of this conclusion. The NRC assessed that this was a violation of NRC requirements related to 10 CFR 72.48(d)(1). Holtec entered the findings into the corrective action program as QI-2714.

10 CFR 72.48(d)(1) requires, in part, that the licensee and certificate holder shall maintain records of changes in the facility or spent fuel storage cask design, of changes in procedures, and tests and experiments made pursuant to paragraph (c) of this section. These records must include a written evaluation, which provides the bases for the determination that the change does not require a CoC amendment pursuant to paragraph (c)(2) of this section.

Contrary to the above, Holtec's 72.48 evaluations failed to (1) demonstrate that an estimation of gouge sizes was achieved through any identified methodology and (2) compare the estimated gouge sizes to acceptance criteria for minimum wall thickness, as identified in ASME Section III (or Section XI). The violation resulted in a condition as having a low safety significance. This is Severity Level IV violation (NRC Enforcement Policy, Section 6.2.d.4).

The NRC noted that this violation is not a direct repeat violation to the condition adverse to quality violation identified in QI-2471. For the current violation, the 72.48 evaluation (Nos. 72-1384 and 1357) changes were evaluated under the full evaluation process, however the evaluations lacked sufficient technical justification due to areas that were not considered. Therefore, the current violation is not considered to be an issue that occurred based on ineffective corrective actions, because, the previous SLIV violation

focused on 72.48 screenings that should have been evaluations or evaluations that should have been amendments and technical justification was available but not properly documented. Further, the NRC noted, QI-2471 identified the cause to be inadequate procedure guidance such that the resultant actions warranted enhancing the 72.48 review checklist and procedure to provide additional guidance when processing 72.48's. The NRC determined that, information that was necessary to perform an adequate engineering review and 72.48 evaluation was omitted such that the conclusions drawn the by these documents were without adequate technical and regulatory basis. The NRC cited the April 2019 72.48 violation as a condition adverse to quality and therefore has determined the condition as an occurrence of a missed opportunity in order to prevent recurrence. It is anticipated Holtec's corrective actions shall include a re-evaluation of the previous actions from the April 2019 violation that would have prevented this violation.

### 1.5.3 Round vs Square Lid for the HI-STORM UMAX

The NRC assessed how Holtec evaluated a concern the NRC technical staff discovered regarding the VVM closure lid dose rate measurements described in HI-STORM UMAX technical specifications (TS). The TS compliance issue concerned how the general licensees may take dose rate measurements on the new lid because there was no technical basis for this limit in the shielding analysis of the HI-STORM UMAX FSAR (as updated) performed to demonstrate compliance with 10 CFR 72.236(d). The NRC noted a design change from a circular to a square lid (Version B) and that the dose rate of 30 mrem/hr, (gamma+neutron) in the area of the VVM annulus, was not derived from an analysis supported in the FSAR. TS 5.3.8 specifies the location the general licensee shall measure the VVM lid for dose rates (i.e., 18 inches from the edge of lid) to ensure limits are not exceeded. This location was intended to be in the area of the VVM annulus. If the general licensee exceeds the dose rate limits, then they must evaluate for a possible off normal loading event or evaluate whether a change to their offsite dose calculations are necessary. General licensees also use these TS dose rate limits in their emergency action level schemes to declare an unusual event. The team noted that Holtec has since performed and submitted an analysis to calculate, measure and document dose rates specific to the particular closure lid to satisfy the intent of TS Section 5.3 as part of a HI-STORM UMAX system, Amendment 4 submittal. Holtec has since committed (QI-2471) to revise previous HI-STORM UMAX amendments once Amendment 4 is approved by the NRC.

## 2 Exit Meeting Summary

The NRC team discussed the preliminary inspection findings with members of your staff on June 13, 2019, at the conclusion of the follow-up inspection. A final exit briefing was conducted telephonically with Mr. Mark Solar, VP Quality assurance, and members of your staff on July 2, 2019.

## NOTICE OF VIOLATION

Holtec International  
Camden NJ

Docket Nos. 72-1014, 72-1040, 72-1032  
EA-18-151

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) follow-up inspection performed June 10-13, 2019, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, dated August 1, 2016, the violation is listed below:

### Violation

10 CFR 72.48(d)(1) requires, in part, that the licensee and certificate holder shall maintain records of changes in the facility or spent fuel storage cask design, of changes in procedures, and tests and experiments made pursuant to paragraph (c) of this section. These records must include a written evaluation, which provides the bases for the determination that the change does not require a CoC amendment pursuant to paragraph (c)(2) of this section.

Contrary to the above, Holtec's 72.48 evaluations failed to (1) demonstrate that an estimation of gouge sizes was achieved through any identified methodology and (2) compare the estimated gouge sizes to acceptance criteria for minimum wall thickness, as identified in ASME Section III (or Section XI).

This is a Severity Level IV violation (NRC Enforcement Policy, Section 6.2.d.4).

Pursuant to the provisions of 10 CFR 2.201, Holtec is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to Christian Araguas, Chief, Inspections and Operations Branch, Division of Spent Fuel Management, Office of Nuclear Material Safety and Safeguards, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; (4) your plan and schedule for completing short and long term corrective actions and (5) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's

document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/readingrm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21. If Classified Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR Part 95. In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 16 day of August 2019.