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

EXHIBIT
USNRC

JUN 3 1992

'92 JUN -4 P1:58

OFFICE OF SECRETARY
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BRANCH

G. Paul Bollwerk, III
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
10825 South Glen Road
Potomac, Maryland 20854

In the Matter of
ALABAMA POWER COMPANY
(Joseph M. Farley Nuclear Plant, Units 1 and 2)
Docket Nos.: 50-348-CivP; 50-364-CivP ASLBP No. 91-626-02-CivP

Dear Administrative Judges:

Pursuant to the Atomic Safety and Licensing Board's June 1, 1992 Memorandum and Order (Closing Evidentiary Record; Establishing Schedule and Guidelines for Proposed Findings and Conclusions), the NRC Staff herein submits an updated exhibit list incorporating the exhibits used during the rebuttal/surrebuttal portion of the evidentiary hearing.

Sincerely,

Eugene Holler
Eugene Holler
Counsel for NRC Staff

Enclosure: As stated

cc: Service List

9206080136 920603
PDR ADOCK 05000348
G PDR

2507

STAFF EXHIBITS
(Cross-referencing APCo exhibits)

Staff #

- 1 STAFF PROFESSIONAL QUALIFICATION (RESUMES)
- 2 NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
Cover letter dated August 15, 1988 - signed by J. Nelson Grace, Regional Administrator (RII)
NOV dated August 15, 1988 - signed by Grace

APCo Exh. #33 REFER TO AS STAFF EXH. #2
- 3 ORDER IMPOSING CIVIL MONETARY PENALTY
Cover letter dated August 21, 1990 - signed by James H. Sniezek
Order dated August 21, 1990 - signed by Sniezek

APCo Exh. #34 REFER TO AS STAFF EXH. #3
- 4 MODIFIED ENFORCEMENT POLICY RELATING TO 10 C.F.R. 50.49 "ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS" (GENERIC LETTER 88-07)
Memorandum to: All Power Reactor Licensees and Applicants
From: NRC
Dated: April 7, 1988

APCo Exh. #2 REFER TO AS STAFF EXH. #4
- 5 SECY PAPER SECY-87-255
PROPOSED MODIFICATION OF POLICY ON ENFORCEMENT. . .
Dated: October 13, 1987
- 6 SECY PAPER SECY-85-220
ENVIRONMENTAL QUALIFICATION PROGRAM ACTIONS RESULTING FROM APRIL 2, 1985 COMMISSION MEETING
Dated: June 18, 1985
- 7 INFORMATION RELATING TO THE DEADLINES FOR COMPLIANCE WITH 10 C.F.R. 50.49, "ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS" (GENERIC LETTER 85-15)
Memorandum to: To All Licenses of Operating Reactors
From: Hugh L. Thompson
Dated: August 6, 1985
- 8 SECY PAPER SECY-86-122
POLICY FOR ENFORCEMENT OF ENVIRONMENTAL QUALIFICATION REQUIREMENTS
Dated: April 21, 1986

9 INFORMATION RELATING TO COMPLIANCE WITH 10 C.F.R. 50.49,
 "ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT
 IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS" (GENERIC
 LETTER 86-1) WITH ENCLOSURE
 Memorandum to: To All Licensees and Holders of an
 Application for an Operating License
 From: Harold Denton
 Dated: September 22, 1986

APCo Exh. #28 REFER TO AS STAFF EXH. #9

10 SECY PAPER SECY-88-63
 PROPOSED GENERIC LETTER ON MODIFIED
 ENFORCEMENT POLICY RELATED TO 10 CFR 50.49
 Dated: March 2, 1988

11 NRC INSPECTION REPORT NOS. 50-348/87-25 AND 50-364/87-25
 WITH ENCLOSURE
 Memorandum to: R.P. McDonald From: Alan R. Fordt
 Dated: October 19, 1987

12 NRC INSPECTION REPORT NOS. 50-348/87-30 AND 50-364/87-30
 WITH ENCLOSURE
 Memorandum to: R.P. McDonald From: J. Nelson Grace
 Dated: February 4, 1988

APCo Exh. #55 REFER TO AS STAFF EXH. #12

13 ENFORCEMENT CONFERENCE SUMMARY
 (NRC INSPECTION REPORT NOS. 50-348/87-30 & 50-
 364/87-30)
 Dated: April 13, 1988

14 SECY PAPER SECY-88-213
 NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF
 CIVIL PENALTY FOR EQ VIOLATIONS AT FARLEY
 NUCLEAR PLANT (EA 88-40)

15 RESPONSE OF ALABAMA POWER COMPANY TO THE NOTICE OF
 VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY DATED
 AUGUST 15, 1988
 Cover letter dated November 14, 1988 - signed by W.G.
 Hairston, III

16 LICENSEE EVENT REPORT NO. LER 87-012-00 WITH ENCLOSURE
 Ltr. to: NRC From: R.P. McDonald
 Dated: July 30, 1987
 APCo Exh. #26 REFER TO AS APCo Exh #26

- 17 INSPECTION REPORT NOS. 50-348/87-17 AND 50-364/87-17
INSPECTION AT FARLEY SITE NEAR DOTHAN, ALABAMA
Inspection Conducted: July 10 - August 18, 1987
- 18 EQ SOLENOID VALVE SPLICES - JUSTIFICATION FOR CONTINUED
OPERATION BECHTEL FILE E-91 AP-13169 WITH ENCLOSURES
Ltr. to: W.G. Hairston From: K.C. Gandhi
Dated: July 21, 1987
- 19 JUSTIFICATION FOR CONTINUED OPERATION-ENERGIZED SOLENOID
VALVES IN ENVIRONMENTAL QUALIFICATION SCOPE
Memorandum to: J.D. Woodard From: W.G. Hairston, III
Dated: July 21, 1987
- 20 CECO SPLICE QUALIFICATION TEST INFORMATION WITH
ATTACHMENTS Memorandum to: Nuclear Utility Group on
Equipment Qualification From: Phil Holzman
Dated: January 9, 1987
- 21 NUCLEAR ENVIRONMENTAL QUALIFICATION REPORT FOR OKOGUARD
INSULATED CABLES T-95 & NO. 35 SPLICING TAPES OKONITE
REPORT NO. NQRN-3
The Okonite Company

APCo Exh. #25 REFER TO AS STAFF EXH. #21
- 22 ENVIRONMENTAL QUALIFICATION MEETING OF SEPTEMBER 24, 1987
Ltr. to: J.N. Grace From: R.P. McDonald
Dated: September 30, 1987
- 23 NUREG-0588 Rev. 1
INTERIM STAFF POSITION C. ENVIRONMENTAL
QUALIFICATION OF SAFETY-RELATED ELECTRICAL
EQUIPMENT
Nuclear Regulatory Commission

APCc Exh. #42 REFER TO AS STAFF Exh. #23
- 24 IE BULLETIN NO. 79-01B
ENVIRONMENTAL QUALIFICATION OF CLASS IE EQUIPMENT
with supplemental information
January 14, 1980

APCo Exh. #8 REFER TO AS APCo Exh. #8

- 25 NUCLEAR ENVIRONMENTAL QUALIFICATION TEST REPORT
Wyle Laboratories
October 1987 RE: Qualification Test Program on Splices

APCo. Exh. #39 NOTE: APCo Exh. #39 has Addendum I dated 11/19/88, which Staff Exh. #25 does not have.
- 26 QUALIFICATION OF TAPED SPLICES FOR USE IN INSTRUMENT CIRCUITS SUBJECT TO HARSH ENVIRONMENTS, WATERFORD STEAM ELECTRIC STATION, UNIT 3 (TAC NO. M75348) WITH ENCLOSURE
Memorandum to: Samuel J. Collins and Leonard J. Callan
From: Gary M. Holahan
Dated: May 16, 1990

APCo Exh. #40 REFER TO AS STAFF Exh. #26
- 27 IE BULLETIN 79-01A (DOR GUIDELINES AT ENCLS. 4)
U.S. NRC
Dated: June 6, 1979

APCo Exh. #7 REFER TO AS STAFF Exh. #27
- 28 EVALUATION FOR CONTINUED OPERATION-LIMITORQUE MCV MOTOR POWER LEAD SPLICES IN ENVIRONMENTAL QUALIFICATION SCOPE WITH ENCLOSURE
Memorandum to: J.D. Woodard From: W.G. Hairston, III
Dated: July 30, 1987
- 29 ELECTRIC HYDROGEN RECOMBINER SPLICES - JUSTIFICATION FOR CONTINUED OPERATION (PCR 87-0-4441) BECHTEL FILE A-78, E-91 AP-13541 WITH ENCLOSURE 09/17/87

APCo Exh. #45
- 30 ELECTRIC HYDROGEN RECOMBINER SPLICES - JUSTIFICATION FOR CONTINUED OPERATION (PCR 87-0-4441) BECHTEL FILE A-78, E-91 AP-13541 WITH ENCLOSURE 09/23/87
Bechtel Eastern Power Company
Ltr. to: W.G. Hairston From: K.C. Gandhi
Dated: September 23, 1987

APCo Exh. #43 REFER TO AS STAFF Exh. #30
- 31 WCAP-9347
QUALIFICATION TESTING FOR MODEL B ELECTRIC HYDROGEN RECOMBINER

Westinghouse Electric Corp.
 J.F. Wilson
 Dated: July 1978

APCo Exh. 47 REFER TO AS STAFF Exh. #31

32 WCAP-7709-L
 ELECTRICAL HYDROGEN RECOMBINER FOR WATER
 REACTOR CONTAINMENTS
 Westinghouse Electric Corp.
 J.F. Wilson
 Dated: July 1971

APCo Exh. #44 REFER TO AS STAFF Exh. #32

33 QUALIFICATION TESTING OF RAYCHEM ENVIRONMENTAL SEALS FOR
 ALABAMA POWER COMPANY JOSEPH M. FARLEY NUCLEAR PLANT
 Approved: J.E. Love
 Dated: December 30, 1981

APCo Exh. #62 REFER TO AS STAFF Exh. #33

34 WYLE LABORATORIES TEST REPORT NO. 58730
 EQ TEST REPORT OF RAYCHEM NEIS NUCLEAR ENVIRONMENTAL
 INTERFACE SEAL KITS FOR RAYCHEM CORP. MENLO PARK,
 CALIFORNIA
 Dated: June 22, 1982

35 EQ TEST REPORT OF RAYCHEM NEIS ENVIRONMENTAL INTERFACE
 SEAL KITS ON STAINLESS STEEL PIPE (EDR-6063)
 RAYCHEM ENERGY DIVISION Bechtel Power Corp. Job No.
 15026
 Dated: November 20, 1985

APCo Exh. #65 REFER TO AS STAFF Exh. #35

36 EQ PACKAGE NO. 29G RAYCHEM NCB WITH CHICO-A SEAL
 Table of Contents
 Dated: N/A

37 SYSTEM COMPONENT EVALUATION WORKSHEET SCEW NO. 29G
 Sheet 1 of 6 Approved by: James Sundergill
 Dated: November 30, 1987

38 EQ REPORT EVALUATION #29G
 Raychem/CHICO Equipment Entrance Seal
 Revised by: Robert A. Frink
 Dated: September 8, 1987

39 EQ TEST REPORT OF RAYCHEM NUCLEAR CABLE BREAKOUT AND END SEALING KITS FOR RAYCHEM CORP. MENLO PARK, CALIFORNIA
Wyle Laboratories No. 58442-2
Dated: N/A

APCo Exh. #60 REFER TO AS STAFF Exh. #39

40 TESTING AND IRRADIATION OF FOUR INCH EYS CONDULET
Ltr. to: Gene Pettit From: Jesse I. Ramon with
Enclosures
Reference: Bechtel Purchase Order No. 9645
SWRI Project No. 03-4974-001
Dated: February 1, 1979

APCo Exh. #63 REFER TO AS STAFF Exh. #40

41 ANALYSIS OF HEAT AGING DATA ON -52 MOLDING MATERIAL TO DETERMINE PRE-AGING CONDITIONS FOR NUCLEAR QUALIFICATION TESTING
Raychem Energy Division Report EDR-5040
Dated: October 15, 1981

42 CHICO-A4 SEALING COMPOUND ENVIRONMENTAL QUALIFICATION (ES-86-769) BECHTEL FILE A.88/E-91 AP-12696 BECHTEL JOB 7597-042
Ltr. to: W.G. Hairston From: K.C. Gandhi
Dated: March 11, 1987

43 TRAY AND CONDUIT GENERAL DETAILS AND NOTES
Bechtel Drawing No. A-177541
Bechtel Corp. Job: 7597-03
Dated: N/A

APCo Exh. #66 REFER TO AS STAFF Exh. #43

44 INFORMATION NOTICE NO. 84-57: OPERATING EXPERIENCE RELATED TO MOISTURE INTRUSION IN SAFETY-RELATED ELECTRICAL EQUIPMENT AT COMMERCIAL POWER PLANTS
Dated: July 24, 1984

45 CASE STUDY REPORT - OPERATING EXPERIENCE RELATED MOISTURE INTRUSION IN ENVIRONMENTALLY QUALIFIED ELECTRICAL EQUIPMENT AT COMMERCIAL POWER PLANTS (AEOI-C402)
Memorandum to: Harold Denton and Others
From: CJ. Heltemes, Jr.
Dated: September 19, 1983

46 APCO 3 PAGE ANALYSIS
November 25, 1987

- 47 EQ OF RAYCHEM/CHICO SEALANT AND TERMINAL BLOCKS
Ltr. to: D.M. Verrelli From: R.P. McDonald
Dated: January 8, 1988

APCo Exh. #64 REFER TO AS STAFF Exh. #47
- 48 IE INFORMATION NOTICE NO. 84-47
EQ TESTS OF ELECTRICAL TERMINAL BLOCKS
U.S. NRC
Dated: June 15, 1984

APCo Exh. #51 REFER TO AS STAFF Exh. #48
- 49 TERMINAL BLOCK INSULATION Vs. TEMPERATURE
GRAPH 11/25
Figure A1-21, Page 210
Source: SNL Report SAND 83-1617
Dated: N/A
- 50 INSULATION RESISTANCE Vs. TEMPERATURE
CHART #1 (Medium Bold Title)
Data based on SAND83-1617
Dated: N/A
- 51 INCULATION RESISTANCE Vs. TEMPERATURE
CHART #2 (Large Bold Title)
Data based on SAND83-1617
Dated: N/A
- 52 LIMITORQUE REPORT 600198
LIMITORQUE VALVE CONTROL TEST REPORT
Dated: January 2, 1969

APCo Exh. #68 REFER TO AS STAFF Exh. #52
- 53 LIMITORQUE REPORT 600456
QUALIFICATION TYPE TEST REPORT
Dated: December 9, 1975
Performed: June 7 - Nov. 22, 1974

APCo Exh. #69 REFER TO AS STAFF Exh. #53
- 54 LIMITORQUE TEST REPORT B0058
NUCLEAR QUALIFICATION
Dated: N/A

APCo Exh. #67 REFER TO AS STAFF Exh. #54

- 55 IE INFORMATION NOTICE 83-72
 ENVIRONMENTAL QUALIFICATION TESTING EXPERIENCE
 U.S. NRC
 Dated: October 28, 1983

 APCo Exh. #72 REFER TO AS STAFF Exh. #55
- 56 SECY PAPER SECY-90-093
 STATUS OF ENFORCEMENT ACTIONS TAKEN UNDER THE
 "MODIFIED ENFORCEMENT POLICY RELATING TO
 10 CFR 50.49 (MODIFIED POLICY)
 Dated: March 12, 1990
- 57 EVALUATION LICENSEE'S PROGRAM FOR QUALIFICATION OF
 ELECTRICAL EQUIPMENT LOCATED IN HARSH ENVIRONMENT
 FRC Report No. 5896-05-1
 Dated: April 4, 1985 Comments: April 16, 1991
- 58 LTR From: HOLLER TO: BOARD
 INCLUDING CHARTS AND DIAGRAMS - Submission by parties to
 Staff request
 Dated: January 16, 1991
- 59 Any and all inspector training manuals or seminar
 materials provided to NRC inspectors in preparation for
 conducting EQ inspections.
- a) Equipment Qualification Seminar Notes, 2/6-8/85,
 Presented by NRC and Sandia, (319 pages)
 - b) Equipment Qualification Seminar Notes, 8/26-28/87,
 Presented by NRC and Sandia, (93 pages)
 - c) Equipment Qualification Seminar Notes with
 handwritten annotations, undated, (6 pages)
 - d) Typed outline with handwritten annotations,
 undated, regarding EQ Inspection Program, (28
 pages)
 - e) Typed outline with handwritten annotations,
 undated, "Qualified Equipment - Specific Examples"
 (48 pages)
 - f) Equipment Qualification Seminar Notes with
 handwritten annotations, 8/26-28/87, Presented by
 NRC and Sandia, (70 pages)
 - g) Memo, Brach to Grimes, 6/8/88, "Environmental
 Qualification Meeting With Regional Counterparts"
 (3 pages)

- h) A genda with handwritten annotations, 6/1/88, "EQ Technical Counterpart Meeting" (4 pages)
- i) Attendance list, undated, (1 page)
- j) Memo, Partlow to Shao, et al., 8/6/87, "Equipment Qualification Seminar" (4 pages)
- k) Typed outline, undated, "EQ Inspection Slides" (16 pages)
- l) Agenda, 8/26-28/87, regarding EQ seminar at Sandia, (3 pages)
- m) Franklin Research Center Report No. 5896-005-2, 7/3/85, "Reference Information For Environmental Qualification Inspections" (47 pages)
- n) Draft of document 39 m, 5/85, (46 pages)

- 60 **IE INFORMATION NOTICE 84-47**
APCo Memo. to File From : M.D. Freeman
Dated: May 27, 1986
- 61 **FEDERAL REGISTER 49 Fed. Reg. 8422**
10 C.F.R. Part 50
EQ of Electrical Equipment
Dated: March 7, 1984
- 62 **GENERIC LETTER 84-24**
Certification of Compliance to 10 C.F.R.,
EQ of Electric Equipment Important to
Safety for Nuclear Power Plants
Dated: December 27, 1984
- 63 **INSPECTION NO. 50-317/84-27**
Docket No. 50-317
ATTN: A.E. Lundvall, Jr.
Dated: January 29, 1985
- 64 **INSPECTION NO. 50-285/85-09**
Docket No. 50-285
ATTN: R.L. Andrews
Dated: July 26, 1985
- 65 **INSPECTION NO. 50-302/85-09**
Docket No. 50-302
ATTN: Walter S. Wilgus
Dated: June 10, 1985

- 66 INSPECTION NO. 50-266/85013;
 50-31/85013
 Docket No. 50-266; 50-301
 ATTN: C.W. Fay
 Dated: November 1, 1985
- 67 Ltr. to: M. Spinelli
 From: C.J. Crane
 Subject: MLEA Project 90009
 Thermal Behavior of T-95
 & Scotch 33
 Serial no. 90-159
 Dated: July 12, 1990
- 68 MEMO. TO: FILE FROM: J.A. MURPHY
 Subj: ANO Tape Splice Test, Info.
 Received from Okonite Regarding
 Thermal Properties of Okonite
 T-95 Splicing Tape
 Dated: June 19, 1990
- 69 SYSTEM COMPONENT EVALUATION WORKSHEET
 Farley Nuclear Plant
 Component: Terminal Block
 Dated: 6/16,87
- 70 SYSTEM COMPONENT EVALUATION WORKSHEET
 Farley Nuclear Plant
 Component: Electrical Penetration
 Dated: 6/16/87
- 71 EQ INSPECTION TRACKING SHEET
 Farley Nuclear Plant EQ Ques. #026
 Inspector: D. Brosseau
 Component: States Term. Block
 Dated: 11/17/87
- 72 EQ INSPECTION TRACKING SHEET
 Farley Nuclear Plant EQ Ques. #027
 Inspector: D. Erosseau
 Component: States Term. Block
 Dated: 11/17/87
- 73 NRC NUREG/CR-3418
 San83-1617 RV
 Title: Screening Tests of Terminal
 Block Performance in a Simulated
 LOCA Environment
 Dated: August 1984

- 74 NRC NUREG/CR-3691
San84-0422 RV
Title: An Assessment of Terminal
Blocks in the Nuclear Power
Industry
Dated: September 1984
- 75 TABLE 1: REGULATORY GUIDE VARIABLE
CROSS REFERENCE TO VARIABLE NO.
Type A - Type E Variables
Tables 1-12
Dated: None available
- 76 IEEE TRANSACTIONS ON NUCLEAR SCIENCE
Vol. 33, No. 1
Westinghouse Setpoint Methodology for
Control and Protection Systems
C.R. Tuley R.B. Miller
Dated: February 1986
- 77 IE INFORMATION NOTICE 85-39
Auditability of Electrical Equipment
Qualification Records at Licensees'
Facilities
Dated: May 22, 1985
- 78 INSTALLATION & MAINTENANCE MANUEL
Series 800/1000/2000/3000
Axivane Fans Adjustable Pitch
Direct Connected Single and Two
Stage Axial Flow Fans
- 79 LUBRICATION GUIDE
EPRI NP-4916
Final Report (2 pages)
Dated: January 1987
- 80 IEEE STD 382-1980
IEEE Standard for Qualification of
Safety-Related Valve Actuators
(Rev. of IEEE Std 382-1972)
Dated: Copyright 1980
- 81 IE INFORMATION NOTICE 79-03
Limitorque Valve Geared Limit
Switch Lubricant
Dated: February 9, 1979
- 82 JOSEPH M. FARLEY COMPOSITE AUDIT REPORT NO. 83/19
SAER File: A35.94.1 Log: 83-417
Dated: December 2, 1983

- 83 STAFF IR V. TEMPERATURE DATA
3 Semi-plots of IR v. Temperature with
Description of Data Source

- 84 STAFF IR V. TEMPERATURE DATA FROM FIGURE 26
Plot of IR v. Temperature From Figure 26 of
SAND 83-1617 Semi-Log

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
ALABAMA POWER COMPANY) Docket Nos. 50-348-CivP
) 50-364-CivP
)
(Joseph M. Farley Nuclear Plant,) (ASLBP No. 91-626-02-CivP)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "LETTER TO ADMINISTRATIVE JUDGES DATED JUNE 3, 1992" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 3rd day of June, 1992:

G. Paul Bellwerk, III*
Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
10825 South Glen Road
Potomac, MD 20854

Office of the Secretary*
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Section

James H. Miller, III, Esq.
Balch & Bingham
P.O. Box 306
Birmingham, AL 35201

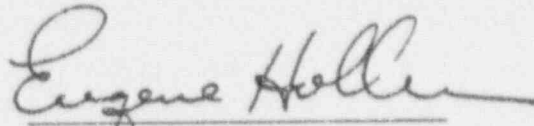
Dr. James H. Carpenter*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Nicholas S. Reynolds, Esq.
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Office of Commission Appellate*
Adjudication
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Adjudicatory File (2)*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

A handwritten signature in cursive script that reads "Eugene Holler". The signature is written in dark ink and is positioned above a horizontal line.

Eugene Holler
Counsel for NRC Staff