APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: STN 50-482/85-02 Construction Permit: CPPR-147

Docket: STN 50-482

Category: A2

Licensee: Kansas Gas and Electric Company (KG&E)

P. O. Box 208

Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: Wolf Creek Generating Station, Burlington, Kansas

Inspection Conducted: January 7-11, 1985

Inspector: JB Band

(C. A. Hackney, NRC (Team Leader)

3/7/25 Date

Other

Inspectors: M. P. Moeller, Pacific Northwest Laboratory

A. L. Smith, EG&G

M. I. Good, Comex Corporation W. Hensen, Comex Corporation

Approved:

J.B. Baird, Chief, Emergency Preparedness

J. S. Martin, Chief, Reactor Project Section A

3/12/85 Date

Inspection Summary

Inspection Conducted January 7-11, 1985 (Report STN 50-482/85-02)

Areas Inspected: Announced, followup preoperational emergency inspection in areas of training, organization, onsite/offsite radiological monitoring, personnel accountability, public education and information, corporate and site emergency plan and pro edures, communications, and emergency response

facilities. The inspection involved 185 inspector-hours onsite by five NRC inspectors.

<u>Results</u>: Within the emergency response areas inspected, one deviation was identified (training commitment not met, paragraph 2). Of the Appendix A items, 45 were closed and 1 remained open.

DETAILS

1. Persons Contacted

KG&E

*G. Koester, Vice President-Nuclear

*B. Thorsen, Emergency Planning

*P. Turner, Manager, Nuclear Training

M. Williams, Superintendent, Regulatory, Quality, Administrative Services

*J. Bailey, Director, Engineering and Technical Services

*C. Mason, Director, Nuclear Operations

*F. Rhodes, Plant Manager

*R. Hoyt, Site Emergency Planning Administrator *K. Moles, Emergency Planning Coordinator (EPC)

*M. Schrieber, Emergency Planning

*W. Lindsay, Supervisor, Quality Assurance Systems

*G. Rathbun, Manager, Training and Radiological Services

NRC

*W. Guldemond, Chief, Resident Inspector Program, WCGS

During the inspection other KG&E personnel in health physics, reactor operations, training, security, quality assurance, records, and other appropriate personnel in the KG&E organization were also contacted.

*Denotes those present at the exit interview.

2. Appraisal Appendix A - Significant Preparedness Deficiencies Closed

(Closed) Open Item (482/8425-01): The NRC inspector reviewed Procedure EPP 02-1.2, Revision 2, Attachment 4.0, which contained a matrix assigning primary and alternate members of the normal WCGS organization to Emergency Plan organizational positions. The matrix also contained the selection criteria for members of the Emergency Response Organization (ERO). Procedure EPP 01-1.2 also referenced the ERO roster which was to be promulgated by the EPC and updated quarterly. Each member of the ERO would receive and sign the emergency organization assignment acknowledgement sheet. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-02): The NRC inspector reviewed the WCGS Radiological Emergency Response Plan, Revision 15, EPP 01-1.1, Revision 2, and Procedure EPP 01-1.2, Revision 2. The WCGS plan, Section 1.2.1, contained a listing of those duties which cannot be delegated. These were consistent with Procedures EPP 01-1.1 and EPP 01-1.2. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-03): The NRC inspector reviewed Procedure EPP 02-1.2, Revision 2, and the Emergency Plan, Section 5.1-1. Procedure EPP 02-1.2 and the Plan both required that the emergency plan coordinator interface with the nuclear training department to insure that training is provided for the home office, general office, system operations, and emergency operations facility (EOF) staff. The procedure and Plan also required that the emergency plan administrator interface with the nuclear training department to ensure that training is provided for the WCGS staff assigned to the ERO. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-04): The NRC inspector reviewed the Plan, Revision 15, which described the emergency preparedness training program. Details of the training program were addressed in Procedure EPP 02-1.2, Revision 2. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-05): The NRC inspector reviewed the Plan to ensure that the actual public information program in existence was described and that the plan was consistent with EPP 02-1.4, Revision 0, "Public Education." The KG&E response appeared adequate.

(Closed) Open Item (482/8425-08): The NRC inspector verified that the lesson plan for Module No. 4 had been revised to indicate that the ENS phone was connected to NRC Headquarters Operation Center, Bethesda, Maryland. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-09): The NRC inspector verified that the lesson plan for Emergency Action Level (EAL) protective action recommendation was revised to reflect the meaning of emergency action level as indicated in 10 CFR Part 50, Appendix E, paragraph IV.C. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-10): The NRC inspector verified that Procedure EPP 02-1.2 addressed selection criteria for assignment of personnel to emergency response positions. Training had been completed for primary and alternate positions for members of the emergency response organizations. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-11): The NRC inspector determined on February 12, 1985, via telephone conversation with a KG&E representative that training of personnel on station recall procedures had been conducted. The licensee had committed to having a station recall training for emergency response personnel. The training was completed on January 25, 1985. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-12): The NRC inspector reviewed Procedure EPP 01-10.1 to determine if a discontinuity existed in the case of subzones which overlap the 5 mile radius in paragraph 7 of Attachment 1. Attachment 1 was not included in the attachment. Conflicts between Procedure EPP 01-10.1, paragraph 5.1.3.1, and paragraphs 1.4.1.1.1 and 1.4.1.2 of the Plan concerning authority and responsibility for protective

action recommendations had been resolved. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-16): The NRC inspector determined that the installation, testing, and turnover of the high efficiency particulate air (HEPA) filter system and the General Atomics iodine monitor in the TSC were committed to be completed by February 15, 1985. Procedure EPP 01-4.1, Revision 2, required hourly checks of the TSC iodine monitor. Air samples were taken if readings are 100 CPM above background. It also provided an alternate method of monitoring for iodine concentration if the General Atomics unit is out of commission. The TSC door gaskets had been replaced and the doors were operable. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-17): The NRC inspector verified that Procedure EPP 01-4.1, Revision 2, required calls for hourly checks of the TSC iodine monitor and air samples to be taken if readings on the iodine monitor or the area frisker are 100 CPM above background. If the laboratory were to be evacuated, Procedure EPP 01-8.2 had a method for counting the air sample using a frisker. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-18): The NRC inspector reviewed the TSC controlled copies of the Plan (copy no. 21) and the Emergency Plan Implementing Procedures' (EPIPs') (copy no. 107) in the TSC. The KG&E response appeared to have satisfied this portion of the open item. The sheets entering the deletion of the Administrative (ADM) 12 Series into the document control system were signed. The ADM Series index covering the deletion of the ADM 12 Series had been completed. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-21): The NRC inspector reviewed Procedure EPP 01-4.2, Revision 2, Section 4.4.11, which provided radiological limits for direct radiation and radioactive airborne contaminants. It appeared that the listed radiological limits may be used to evaluate and determine the need for evacuating the OSC during an emergency. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-22): The NRC inspector reviewed Procedure EPP 01-4.2, Revision 1, Sections 4.1.1, 4.4.6, Attachment 7.0, and 4.4.11, as well as training and drill records. The procedures appeared to adequately identify the backup operational support center (OSC) and provided relocation instructions for the transfer of essential documents, equipment, and personnel from the primary OSC to the designated backup OSC. A drill was conducted on October 26, 1984, which included the evacuation of the primary OSC to the backup OSC located in the security building basement. The drill critique record did not detail the events of the OSC evacuation, however, a discussion with the emergency planning coordinator and the station health physicist indicated that essential documents, equipment, and personnel were relocated in the backup OSC and

operations were resumed in approximately 15 minutes. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-23): The NRC inspector reviewed Procedure EPP 01-4.2, Revision 1, Section 4.4.9, and 4.4.9.1, and Procedure EPP 01-1.1, Revision 1, Section 4.2.3.7. These procedures appeared to provide adequate instructions for periodic monitoring of the habitability of the OSC and identified the onsite survey team director (OSTD) as having the responsibility to determine initial and periodic habitability. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-26): The NRC inspector determined that the installation and turnover of the General Atomics air monitor in the EDF was not complete Procedure EPP 01-3.3, Revision 2, provided for hourly monitoring of the EOF. The procedure provided for General Atomics iodine monitor reading and for air samples if the general area was 100 CPM above background. The procedure also provided a standby method of taking iodine samples if the General Atomics unit was out of commission. Three hundred TLDs had been provided in the environmental laboratory (at the EOF) for issue during emergencies. The TLDs from the EOF had been removed for calibration on January 4, 1985, and were scheduled to be returned by Friday, January 11, 1985. There were sufficient dosimeters in the EOF to fulfill the requirements of paragraph 4.1.6.1 of Procedure EPP 01-9.1, Revision 1. The KG&E response appeared adequate.

(Closed) open Item (482/8425-27): The NRC inspector reviewed the EOF status board installation which appeared adequate. The compass rose on the installed board was correctly labeled. The zoning included in Procedure EPP 01-10.1 was consistent with the 10 mile EPZ charts. Procedure EPP 01-3.3, Revision 1, no longer had any zoning references. The charts had been confirmed to accept zone overlays which were correct and appeared to be adequate in number. The emergency kit cabinets had been sealed. The cancelled ADM 12 Series procedures had been removed from the EOF ADM volume and the index correctly reflected the volume's content. The microfiche library (actually aperture cards) were in place and adequate. The exterior door facing the B building closure device had been repaired. It was inspected by the inspector, and found to perform satisfactorily. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-32): The NRC inspector verified that the emergency planning information brochure had been distributed to the public. The NRC inspector reviewed a letter dated November 1, 1984, attesting to the delivery of 3566 emergency information booklets being delivered to the post offices in the Coffey County area. The information brochure contained a 24 hour public information number. The NRC inspector called the toll free number. It took approximately 5 minutes of waiting before an information person could be reached; however, a KG&E representative did answer the telephone and was aware of their duties. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-33): The NRC inspector reviewed the Plan, Revision 15, Article 4.1.2.2, referred to the Information Clearinghouse. Article 4.1.2.3 referred to the media response center (MRC) and correctly located it in Topeka, Kansas. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-36): The NRC inspector reviewed a letter from Lyle Koerper to Kevin Moles dated January 3, 1985. The subject of the letter concerned electrical outlets for the MRC at Topeka, Kansas during an emergency at the WCGS. Mrs. Joy Cole of the State of Kansas, Public Information Office informed Mr. Koerper that additional portable electrical generators would be available from the State Adjutant General's Office in the event of an emergency at the WCGS. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-37): The NRC inspector reviewed Procedure EPP 02-1.6 which outlined periodic inspection checks of emergency communications equipment. The procedure appeared adequate. The NRC inspector verified that onsite and offsite emergency communications equipment was located as specified in the Emergency Plan. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-38): The NRC inspector reviewed the WCGS emergency alarm signal memo describing the plant emergency alarm signal. The NRC inspector verified that the emergency alarm signal had been described during personnel general emergency training. The NRC inspector canvassed 29 site personnel and determined that approximately two thirds of these individuals were familiar with the plant emergency alarm signal. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-39): The NRC inspector reviewed the status of the installation of the emergency notification system (ENS) and the health physics network (HPN) telephone system.

The NRC inspector determined that the ENS instruments had been installed at the TSC and the NRC resident inspector's office. Further, it was determined that neither instruments were operating on January 10, 1985. Discussions with a KG&E staff member indicated that the telephone company was working on the completion of the installation of the ENS telephone system in the control room and the emergency operations facility.

KG&E issued a letter to the operations personnel date January 11, 1985, which stated that existing commercial telephone service would be used to notify the NRC of required reportable events.

The HPN system had not been installed. The KG&E personnel were to use existing commercial telephones located in the control room, technical support center, and the emergency operations facility for communicating with the NRC Headquarters Emergency Center and the NRC Region IV incident response center. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-44): The NRC inspector verified that KG&E had made provisions for a vehicle for each offsite radiologica' monitoring team. The vehicles appeared adequate for the offsite teams' needs. Procedure EPP 02-1.5, Revision 1, and provisions appeared adequate for offsite radiological monitoring teams acquiring a vehicle. Procedure EPP 02-1.5, Revision 1, appeared to adequately control the use of the vehicles during normal operations. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-48): The NRC inspector reviewed the Plan, Revision 15, and the latest revisions of the EPIP to insure consistency. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-49): The NRC inspector determined that the Emergency Operating Procedures Manual had not been revised using the WCGS temporary change notice procedure to reference emergency plan procedures where applicable. This is an interim measure pending revision of the emergency operating procedures. The KG&E response dated January 4, 1984 committed to a revision of the emergency operating procedures by March 1, 1985.

(Closed) Open Item (482/8425-50): The NRC inspector reviewed Procedures EPP 01-3.4, Revision 0, and EPP 01-3.6, Revision 0, which address ERO callout. During normal working hours, plant alarms and gaitronics announcements were to be used. Pagers were to be used as a backup for key emergency response personnel. During nonworking hours, callout was to be accomplished using commercial telephones backed up by pagers for key personnel. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-51): The NRC inspector reviewed distribution of tone alert radios. Approximately 556 residential and 19 commercial tone alert radios had been distributed to residents within the 10 mile emergency planning zone (EPZ). Individuals who did not want radios or could not be contacted (about 25 residents) were placed on the county engineer's special notification list. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-53): The NRC inspector reviewed documents which indicated that the prompt public notification system had been installed. Independent testing of the system was conducted by Wyle Laboratories and documented for the 10 mile EPZ siren coverage. An improved antenna was installed on the Waverly siren to solve an activation problem encountered during initial testing. The siren maintenance program had been addressed in Procedure EPP 02-1.8, Revision 0. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-54): The NRC inspector reviewed Procedures EPP 01-7.1, EPP 01-7.2, and EPP 01-7.3 to determine if the Radiological Release Information System (RRIS) was adequately described and to determine if those procedures cross referenced adequate parameters, variables, and dose assessment calculations. It appeared that both

concerns had been completed adequately. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-55): The NRC inspector reviewed Procedure EPP 01-7.3 to determine if the procedure had been revised to correct the potential for inaccurate integrated and projected integrated dose calculations in the manual dose projection method. Section 4.3.2.6 appeared to present adequate instructions to avoid incorrect results. However, the phrase "may be set to zero" should be "should be set to zero" to ensure correct operation. A benchmark case to test operability should be added as planned. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-56): The NRC inspector verified changes to Procedures EPP 01-7.2 and EPP 01-7.3 to provide a means of calculating the radiological impact of a release of radioactivity from the steam driven auxiliary feedwater pump. Procedure EPP 01-7.2, Attachment 3, included default release rates for both noble gases and radioiodine from the steam turbine driven auxiliary feedwater pump. Procedure EPP 01-7.3 appeared to provide an adequate calculation method for dose projection based upon the default release rates. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-57): The NRC inspector reviewed Procedure EPP 01-10.1, Revision 1, Attachment 1 to determine if the flow chart for general emergency decisionmaking reflected the emergency action level barrier criteria classification scheme. The flow chart appeared to be adequate in that it reflected the emergency action level barrier criteria. The flow chart could have been more effectively organized to ensure visual clarity. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-58): The NRC inspector reviewed procedures relating to the individual responsible for radiological assessment. Although no separate procedure existed, revisions to Procedures EPP 01-1.1, EPP 01-1.2, and EPP 01-7.3 and the completion of EPP 01-7.1 appeared to provide adequate instruction and direction for the individual responsible for radiological assessment. The revised radiological emergency coordinator's (REC) checklist, EPP 01-1.1, Attachment 6.0, appeared to provide adequate instructions to the REC. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-65): The NRC inspector determined that Procedure EPP 01-5.1 required security personnel to verify that plant personnel within the exclusion area evacuate following the request to evacuate the exclusion area. Consequently, the NRC inspector determined that procedures to maintain and verify the readiness of the facility public address system may not be required. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-71): The NRC inspector reviewed Procedure EPP 01-5.1, Revision 2, which appeared to provide a capability for controlling personnel access to the protected area at an alternate location in the event that evacuation of the primary access control

station (PACS) became necessary. EPP 01-5.1, Revision 2, Section 4.1.6, stated that off-duty ERP personnel who were called in response to an emergency at Wolf Creek Generating Station (WCGS) would report to the WCGS education center or EOF, if they were activated prior to personnel arriving onsite. The KG&E response appeared to be adequate.

(Closed) Open Item (482/8425-72): The NRC inspector reviewed Procedures EPP 01-5.1 and EPP 01-6.1 and discussed with the emergency planning coordinator the need for an alternate personnel accountability station for nonessential workers required to evacuate during a full scale exclusion area evacuation in the event that the PACS evacuation was necessary. Procedures EPP 01-5.1 and EPP 01-6.1 provided for optional nonessential personnel evacuation of the protected area at the alert classification: and mandatory evacuation at a site area emergency classification. The KG&E staff concluded that the PACS area would be habitable and available for evacuation control until the emergency degraded to a general emergency at which time PACS could be potentially rendered radiologically uninhabitable. KG&E procedures require local evacuation for localized incidents and mandatory evacuation of all nonessential personnel at the site area emergency. Therefore, it appeared that the evacuation of nonessential personnel through PACS would be completed following the declaration of a site area emergency and prior to events which could possibly initiate a PACS area evacuation. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-75): The NRC inspector reviewed the title of Procedure EPP 01-2.1 which had been changed to "Emergency Classification." The NRC inspector reviewed the EPPs and found no situations where an improper distinction between Emergency Classification and Emergency Action Levels still existed. Procedures EPP 01-2.1 and EPP 01-2.2 contained proper references to EPP 01-12.1. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-86): The NRC inspector reviewed the Plan, Revision 15, which did not include the requirements of 10 CFR Part 50.54(t) and NUREG 0654 with regard to performance of an annual independent emergency preparedness program review. The licensee had committed to a revision to include requirements of 10 CFR Part 50.54(t) by January 16, 1985. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-87): The NRC inspector determined from a review of correspondence and from contact with offsite agencies that procedures, training, and equipment were in place. Training sessions had been conducted for the hospital and fire department personnel. Equipment calibration programs indicated that the hospital had received radiological monitoring devices. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-88): The NRC inspector received a copy of the telephone book for residents located in the Coffey County area. The December 1984 telephone directory had been distributed during the month of December 1984, and the KG&E emergency planning information was contained

on pages 23 and 24 of the telephone directory. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-89): The NRC inspector received a news media briefing agenda dated October 16, 1984. The news media briefing was held October 24, 1984, in Topeka, Kansas (a.m.) and at WCGS (p.m.). There were 31 media representatives that attended the KG&E sponsored media briefing. The KG&E response appeared adequate.

(Closed) Open Item (482/8425-90): The NRC inspector determined that this item required the recycling of all operators licensed as of the September 17-28, 1984, appraisal through emergency classification training because of weaknesses found in the licensed operator knowledge during the appraisal. KG&E reported this item as completed in its January 4, 1985 letter to the NRC (KMLNRC 85-008) based on the staff expectation that training would be completed on that date. In the initial review of this item, the NRC inspector determined that two individuals scheduled for training on January 4, 1985, did not meet the schedule and had not received the subject training prior to the arrival of the inspection team on January 7, 1985. This was considered to be a deviation from commitment (see paragraph 4). These individuals received the training on January 8 and 9, 1985.

The NRC inspector performed a hard copy search of training records for licensed operators. There were 4 licensed operators for whom recycle training records could not be produced by KG&E.

The NRC inspector's continued review determined that the station computer training records did not confirm that the subject training had been conducted. A review of hard copy records indicated that two of the licensed operators of concern (those who had licenses at the time of the September 17-28, 1984, appraisal) had received formal recycle training in the 23000 Series course.

The NRC inspector determined that a required reading method had been used to document the recycle training. The required reading package was reviewed and the signed sheets signifying compliance were provided to the NRC team. These sheets indicated that five operators of concern had complied with the required reading package in November, 1984, prior to the NRC inspection team's arrival. The licensee obtained compliance sign-off sheets from 11 additional operators of concern on January 9 and 10, 1985, during the inspection team's visit to the site. There were four remaining operators of concern for whom records of compliance with required recycle training had not been provided. KG&E obtained these sign-off sheets during the back shifts on January 10 and 11, 1985. In view of the above, the KG&E response appeared adequate.

(Closed) Open Item (482/8425-91): The NRC inspector verified that Procedure EPP 01-10.1 had been revised to incorporate the guidance of NRC I&E Information Notice 83-28, specifically sheltering 2-5 miles in the downwind and adjacent sectors on any general emergency. Population data by subzone had been added to Procedure EPP 01-10.1. The KG&E response appeared adequate.

3. Appraisal Appendix A - Significant Preparedness Deficiencies Open

Open (482/8425-52): The NRC inspector determined that an unannounced, off hours augmentation of the emergency organization to include the control room, TSC, and OSC had not been conducted. The KG&E unannounced shift augmentation is to be conducted prior to exceeding 5 percent full power operation.

4. Exit Interview

On January 11, 1985, at the conclusion of the preoperational followup inspection, the NRC inspection team and Mr. W. G. Guldemond, Chief, Resident Program, NRC, met with Mr. G. Koester, Vice President-Nuclear, and selected members of the KG&E staff. Mr. C. A. Hackney, the NRC team leader, discussed the status of the Appendix A and Appendix B inspection findings. There were four Appendix A items which were closed based on commitments made by KG&E; 8425-11, 8425-16, 8425-86, and 8425-90. The NRC inspector was given a list of commitments in a letter dated January 11, 1985, from G. Koester, Vice President-Nuclear to MR. R. P. Denise, Director, Wolf Creek Task Force. Further, an interoffice correspondence letter dated January 11, 1985, from F. T. Rhodes, plant manager, to distribution, directed that NRC notifications would be made via commercial lines until the ENS telephone was installed in the control room.

The NRC inspector discussed the deviation concerning licensed operators not being trained as stated in a letter dated January 4, 1985, from G. L. Koester, Vice President-Nuclear to R. P. Denise, Director, Wolf Creek Task Force. The NRC inspector was given a signed letter dated January 11, 1985, listing corrective actions which have been taken, corrective actions which will be taken, and dates when all actions would be completed. Additionally, the NRC inspector was given, on January 11, 1985, four signed sheets indicating that recycle training had been conducted for the four licensed operators that had missing training records. The KG&E response appeared adequate. The KG&E management representatives were informed that final reviews of the KG&E response would be conducted at the NRC Regional office.