

**From:** Hon, Andrew  
**Sent:** Friday, July 5, 2019 7:52 AM  
**To:** 'Billie Garde'  
**Cc:** Buckberg, Perry; Shoop, Undine; Carpenter, Robert; Welling, Blake  
**Subject:** Screening result of 2.206 petition regarding TVA ECP Changes

Ms. Garde,

I am writing to inform you of the results of the NRC staff evaluation of your request for immediate action under 10 CFR 2.206. Specifically, in your letter dated June 4, 2019, you requested that the NRC immediately take three actions: issue an announcement to TVA employees regarding employee rights to raise safety concerns, require TVA to stop conversion of its Employee Concern Program (ECP), and require that TVA present its new ECP program to the NRC and to the public. The NRC staff reviewed these immediate action requests and concluded, in accordance with Section II.B.1 of Management Directive (MD) 8.11 (ML18176A147), that the requests do not warrant immediate action because they do not demonstrate an immediate safety concern to a regulated facility or to the health and safety of the public.

The NRC staff has also performed a 2.206 Petition Screening using the nine criteria defined in Section II.A.2(d) of MD 8.11. The portions of your petition that assert potential violations of the NRC's employee protection regulations at 10 CFR 50.7 screen out of the 2.206 process because they either relate to issues that are already being considered in other NRC processes or have been transferred to other NRC processes, for which cognizant NRC staff will contact you. With respect to your three requested actions, the first request, that the NRC provide additional notice to TVA employees regarding employee concerns, is screened out of the 2.206 process under criterion v because it is not a request for the NRC to take an enforcement-related action (such as to modify, suspend, or revoke a license). The two remaining requests in your petition, however, will be considered by a Petition Review Board (PRB). The NRC staff is convening a PRB to evaluate your petition using the MD 8.11 petition evaluation criteria.

We will keep you updated regarding the status of our review of your petition.

Thank you.

Andy Hon, Petition Manager

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 518

**Mail Envelope Properties** (BN8PR09MB36332EBEA7EF84D665FCAE5699F50)

**Subject:** Screening result of 2.206 petition regarding TVA ECP Changes  
**Sent Date:** 7/5/2019 7:51:58 AM  
**Received Date:** 7/5/2019 7:51:59 AM  
**From:** Hon, Andrew

**Created By:** Andrew.Hon@nrc.gov

**Recipients:**

"Buckberg, Perry" <Perry.Buckberg@nrc.gov>  
Tracking Status: None  
"Shoop, Undine" <Undine.Shoop@nrc.gov>  
Tracking Status: None  
"Carpenter, Robert" <Robert.Carpenter@nrc.gov>  
Tracking Status: None  
"Welling, Blake" <Blake.Welling@nrc.gov>  
Tracking Status: None  
"Billie Garde" <bpgarde@cliffordgarde.com>  
Tracking Status: None

**Post Office:** BN8PR09MB3633.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1989	7/5/2019 7:51:59 AM

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**Priority:** Normal  
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**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**