



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 8, 1997

Gerald Charnoff, Esq.  
Counsel for Great Bay Power Corporation  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, N.W.  
Washington, DC 20037-1128

50-443

Dear Mr. Charnoff:

I am responding to your letter of October 20, 1997, on behalf of Great Bay Power Corporation (Great Bay) to Chairman Jackson of the U.S. Nuclear Regulatory Commission (NRC) in which you renewed several earlier requests for reconsideration of whether Great Bay is an "electric utility" under the NRC's current definition in 10 CFR 50.2. You indicated that Great Bay wishes to bring to the NRC's attention Great Bay's "view that it has long been considered an 'electric utility,' and its disagreement with the staff position that it does not qualify as an 'electric utility' under the currently effective NRC regulations."

In the NRC's extension of a temporary exemption from sections of 10 CFR 50.75 that apply to non-electric utilities, dated July 23, 1995, the NRC staff explained in detail why it believes that Great Bay does not meet the current definition of electric utility. The NRC staff provided further detail in support of its position in its letter to you of September 18, 1997. Great Bay has offered no new arguments to support its view that it meets the definition of "electric utility" in 10 CFR 50.2. The NRC staff has previously addressed all of the arguments that you have raised in your October 20 letter.

As we described in our earlier correspondence, to meet the definition of "electric utility," a power reactor licensee must "recover the cost of this electricity, either directly or indirectly, through rates established by the entity itself or by a separate regulatory authority" (emphasis added). On the basis of the material submitted to date, Great Bay does not recover the cost of its share of electric power from Seabrook Nuclear Power Station through rates established, as opposed to merely being "accepted," by a separate regulatory authority and does not have the authority to establish its own rates.

As explained in our September 18 letter to you, the statements of consideration to the 1984 rulemaking that promulgated the definition of "electric utility" (49 Fed. Reg. 35747 (1984)) clearly demonstrate that the Commission viewed rates "established" by a separate regulatory authority as those resulting from traditional cost-of-service ratemaking. The Commission has never changed this view, notwithstanding, as you point out, a few general references in NRC staff documents to Great Bay as a "utility." Great Bay simply does not sell electricity at rates established by a separate regulatory authority, that is, rates resulting from a traditional cost-of-service ratemaking process.

Draft



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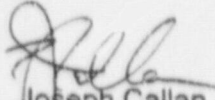
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NRC FILE CENTER COPY

In your October 20 letter, you also again request that you be given the opportunity to argue Great Bay's status as an electric utility before the Commission. As we have previously stated, the Commission's regulations at 10 CFR 50.12 do not provide such an opportunity in connection with the granting of an exemption, and, as for your request for oral argument on whether under the current 10 CFR 50.2, Great Bay qualifies as an electric utility, no proceeding is pending before the Commission in which oral argument may be granted by the Commission under its rules.

Despite the information provided in your October 20 submittal, and in light of the foregoing discussion, I agree with the staff's conclusion that Great Bay does not meet the NRC's definition of electric utility as specified in 10 CFR 50.2.

Sincerely,

A handwritten signature in dark ink, appearing to read 'L. Callan', is written over the printed name.

L. Joseph Callan  
Executive Director for Operations

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Sincerely,  
*Original Signed by*  
*L. J. Callan*  
 L. Joseph Callan  
 Executive Director for Operations

DISTRIBUTION: See next page \*See previous concurrence

DOCUMENT NAME: G:\rsw1\gbletter.107

OFFICE	PGE*	(A)SC:PGE*	(A)C:PGE*	OGC*	(A)D:DRPM
NAME	RWood:sw	MCase*	TEssig*	NLO SHom	JRoe*
DATE	11/ 13/97	11/ 13 /97	11/ 13/97	11/ 14/97	11/ 17/97

OFFICE	D:NRR*	EDC
NAME	SCollins	LCallan
DATE	11/ 18/97	12/8 /97



DISTRIBUTION: Green Ticket 970751 Dated December 8, 1997

Docket File (w/original incoming)(GT 970751)

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LCallan

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JRoe

DMatthews

TEssig

MCase

RWood

MThadani

MBoyle (email)

ADeAgazio

HMiller, RI

SBurns, OGC

KCyr, OGC

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OFFICE	D:NR	EDO
NAME	SCollins	LCallan
DATE	11/12/97	11/ /97



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NAME	SCollins	LCallan
DATE	11/ /97	11/ /97

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**ACTION**

*Recd 10/27/97*

EDO Principal Correspondence Control

FROM: DUE: 11/06/97

EDO CONTROL: G970751  
DOC DT: 10/20/97  
FINAL REPLY:

Gerald Charnoff  
Shaw Pittman Potts & Trowbridge

TO:

Chairman Jackson

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO: 97-1028

Callan, EDO

DESC:

ROUTING:

GREAT BAY POWER CORPORATION -- CURRENT REGULATORY  
DEFINITION OF "ELECTRIC UTILITY" UNDER NRC  
REGULATIONS

Callan  
Thadani  
Thompson  
Norry  
Blaha  
Burns  
Miller, RI  
Cyr, OGC

DATE: 10/23/97

ASSIGNED TO:

CONTACT:

NRR

Collins

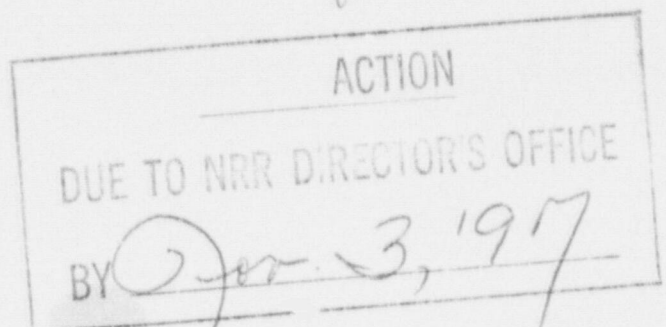
SPECIAL INSTRUCTIONS OR REMARKS:

THE TAG NO. FOR THIS CONTROLLED CORRESPONDENCE IS M99827

NRR RECEIVED: OCTOBER 24, 1997  
NRR ACTION: DEPM:ROE

NRR ROUTING: COLLINS  
MIRAGLIA  
ZIMMERMAN  
SHERON  
TRAVERS  
BOHRER

*EXTENDED  
To 11/17/97*



OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-1028                      LOGGING DATE: Oct 22 97  
ACTION OFFICE: EDO  
AUTHOR: GERALD CHARNOFF  
AFFILIATION: DISTRICT OF COLUMBIA  
ADDRESSEE: CHAIRMAN JACKSON  
LETTER DATE: Oct 20 97                      FILE CODE: IDR 6 COMM/DECOMM  
SUBJECT: GREAT BAY POWER CORPORATION  
ACTION: Appropriate  
DISTRIBUTION: CHAIRMAN  
SPECIAL HANDLING: NONE  
CONSTITUENT:  
NOTES: OCM #10690  
DATE DUE:  
SIGNATURE:                      DATE SIGNED:  
AFFILIATION:



SHAW PITTMAN  
POTTS & TROWBRIDGE

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2300 N Street, N.W.  
Washington, D.C. 20037-1128  
202.663.8000  
Facsimile 202.663.8007

GERALD CHARNOFF, P.C.  
202.663.8032  
gerald\_chnoff@shawpittman.com

10690  
NRC Operating License No. NPF-86  
Docket No. 50-443  
NYN:96031

October 20, 1997

Dr. Shirley Ann Jackson, Chairman  
Office of the Chairman  
Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Dear Chairman Jackson:

On July 23, 1997, the staff of the Nuclear Regulatory Commission ("NRC") extended a previously issued temporary exemption to Great Bay Power Corporation ("Great Bay") from the requirements of 10 C.F.R. 50.75(e)(2) to allow Great Bay more time to obtain "the additional assurance for decommissioning funding required by the regulation" of non-electric utility power reactor licensees.

The July 23, 1997 exemption, by its terms, will expire 90 days following the date any revisions to 10 C.F.R. 50.2 and 10 C.F.R. 50.75 become final agency action, or 1 year from July 23, 1997, whichever date is sooner.

The exemption requires Great Bay to continue its efforts to establish a suitable decommissioning funding assurance arrangement. Great Bay has continued these efforts. It has again asked AON Risk Services to make necessary inquiries. AON has done so. With Great Bay, AON has met with two significant insurance entities, and before the end of this month, these parties will meet again with Great Bay to determine how far they are prepared to go to assist in satisfying the requirements imposed by 10 C.F.R. 50.75(e)(2) on non-electric utilities. As

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required by the exemption, Great Bay will keep the NRC advised of its progress in this regard, as well as other efforts initiated by Great Bay to satisfy these requirements.

Great Bay respectfully appreciates the exemption issued by the NRC to allow it some time to meet these requirements, and will pursue these initiatives to see what might reasonably be accomplished.

Notwithstanding these efforts and this appreciation, Great Bay, also respectfully, wishes to bring to your attention its view that it has long been considered an "electric utility", and its disagreement with the staff position that it does not qualify as an "electric utility" under the currently effective NRC regulations.

Great Bay is aware, of course, that the NRC has published for public comment certain proposed regulations which would amend the definition of "electric utility" in 10 C.F.R. 50.2. Those proposals, however, are not currently in effect, and cannot be used now to determine if Great Bay is an electric utility. Presumably, if the Commission changes that regulation, it would allow existing licensees, including Great Bay, a truly adequate transition period to comply with any such change, barring an immediate danger to the public health and safety which would require otherwise.

### Background

In 1986, Great Bay's predecessor, EUA Power Corporation ("EUA Power"), acquired a 12.13240 % interest in Seabrook from five of the original Seabrook minority owners in 1986. These were Bangor Hydro-Electric Company (2.7391%), Central Maine Power Company (6.04178%), Central Vermont Public Service (1.59096%), Fitchburg Gas and Electric (0.86519%), and Maine Public Service Company (1.46056%). The NRC consented to the transfers to EUA Power of the ownership interests in Seabrook of these five minority owners on September 12,

1986,<sup>1/</sup> and subsequently treated EUA Power as an electric utility within the meaning of its regulations.<sup>2/</sup>

At the time EUA Power acquired its 12.13240 % interest in Seabrook, the only generating assets held by EUA Power was -- like Great Bay today -- its interest in Seabrook. Similarly, EUA Power -- like Great Bay today -- had no retail base. Like Great Bay, EUA Power sold the power generated by its 12.13240 % interest in Seabrook solely at wholesale subject to regulation by FERC.

Further, EUA Power -- like Great Bay today -- did not have a captive buyer to whom it was assured of selling its share of Seabrook's power at wholesale. See Attachments 4-7 to March 28, 1986 Request for Partial Transfer of the Seabrook Construction Permits. Although organized as an indirectly wholly owned subsidiary of Eastern Utilities Associates ("EUA"), the other subsidiaries of EUA (retail and wholesale) were not obligated to buy Seabrook power from EUA Power at rates that would ensure EUA Power's recovery of its Seabrook costs. Id. In fact, it was clearly intended that EUA Power would sell the great majority of its power from Seabrook at least initially at market based rates to entities other than other EUA subsidiaries. Id.

Thus, the NRC in 1986-1990, in circumstances quite like Great Bay's, did not conclude that EUA Power was not an electric utility.

<sup>1/</sup> See "Amendment No. 9 to Construction Permits CPPR-135 and CPPR-136 - Seabrook Station, Units 1 and 2", and the related "Safety Evaluation by the Office of Nuclear Reactor Regulation Relating to Amendment No. 9 to Construction Permits CPPR-135 and CPPR-136 Public Service Company of New Hampshire et al Seabrook Station, Units 1 and 2 Docket Nos. 50-443 and 50-444," dated September 12, 1986. The financial qualifications review done by the NRC in conjunction with the transfer focused solely on whether EUA Power had "demonstrated reasonable assurance" that it could obtain the necessary funds to purchase the proposed ownership interests.

<sup>2/</sup> The Seabrook Operating License issued March 15, 1990 identified EUA Power as one of the Seabrook licensees and referred to the licensees for the plant as "utilities." Similarly, the NRC's "Safety Evaluation . . . Supporting Amendment No. 10 To [The Seabrook] Operating License" of May 29, 1992 describes Seabrook as "being operated on behalf of the licensees, a group of investor-owned and municipal utilities." "Safety Evaluation By The Office Of Nuclear Reactor Regulation Supporting Amendment No. 10 To Facility Operating License No. NPF-86, Public Service Company Of New Hampshire, Seabrook Station, Unit No. 1, Docket No. 50-443," May 29, 1992 (emphasis added).



On February 28, 1991, EUA Power was forced to file for voluntary bankruptcy because it "was unable to negotiate long term power contracts at prices sufficient to cover its operating costs and debt service."<sup>3/</sup> On November 23, 1994 EUA Power emerged from bankruptcy no longer as a subsidiary of EUA but reorganized as Great Bay, an independent wholesale generator. Under the reorganization, the debt of EUA Power's major creditors was converted into 40 % of Great Bay's equity with the remaining 60 % of Great Bay's equity being purchased by other parties who provided new cash input to Great Bay, subject to NRC's approval of the transfer. The NRC consented to the indirect transfer of control over the 12.12340 % interest in Seabrook resulting under this reorganization on August 16, 1993.<sup>4/</sup>

After the reorganization, Great Bay continued to sell power at market based rates subject to the jurisdiction of the FERC, as had EUA Power, and the NRC continued to view Great Bay as an electric utility. For example, the license as amended continued to refer to Great Bay and the other Seabrook licensees (except for North Atlantic Service Company) as "utilities."<sup>5/</sup> Further, the NRC never suggested during its consideration of the transfer or subsequent that Great Bay would ever need to provide a surety under 10 C.F.R. § 50.75(e)(2) required for non-electric utilities.

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<sup>3/</sup> See "Request for Commission Consent to the Indirect transfer of Control of EUA Power Corporation's Interest in the Operating License and for a License Amendment to Reflect the Related Change in Name of the Licensee," at 4-5, dated May 14, 1993.

<sup>4/</sup> See "Amendment No. 23 to Facility Operating License NPF-86: Transfer of Control of EUA Power Corporation's Interest in the License," and the related "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 23 to Facility Operating License No. NPF-86 North Atlantic Energy Service Corporation Seabrook Station, Unit No. 1 Docket No. 50-443," dated August 16, 1993. The NRC did not directly address in its safety evaluation whether Great Bay was an electric utility, but focused instead on the fact that Great Bay could be expected to recover its future costs through long term power contracts. As the Staff acknowledges in its January 22, 1997 exemption order, however, it believed at the time that Great Bay was an electric utility within the NRC's definition. See January 22, 1997 Exemption Order at 2.

<sup>5/</sup> Amendment No. 23 to Facility Operating License No. NPF-86, for the Seabrook Station Unit No. 1, August 16, 1993.

### The Current Dispute

On May 8, 1996, Great Bay requested NRC's consent under 10 C.F.R. § 50.80 to the indirect transfer of control resulting from its proposed formation of a parent holding company. This restructuring did not affect in any way the conduct by Great Bay of its electric business. From 1994 forward, Great Bay undertook no change in the way it conducted its business so as to alter whether it was an "electric utility" within the NRC's definition. Great Bay has been, and is marketing its power from Seabrook subject to FERC jurisdiction. The NRC staff, unaccountably, however, chose to determine for the first time on January 22, 1997, that Great Bay was not an "electric utility," contending that because Great Bay sold most of its power based on short-term spot market rates instead of long-term contracts, it was not an "electric utility."

In its July 23, 1997 exemption order, apparently in response to Great Bay's pleadings dated February 21, 1997 and June 4 1997, the Staff acknowledged that "[t]here is no distinction between long-term and short-term sales in connection with the [NRC's] definition of electric utility."<sup>42</sup> Although agreeing with Great Bay that the rationale of the January 22, 1997, order was incorrect, the Staff nevertheless again concluded that Great Bay is not an electric utility, this time contending that FERC's authorized long term and short term rates are not established through a "traditional cost-of-service ratemaking process."<sup>43</sup> These words, however, appear nowhere in the current definition of an electric utility in 10 C.F.R. § 50.2, but only in the new proposed draft regulations, now published for comment, which can have no legal effect until properly promulgated under the Administrative Procedures Act.

In response to Great Bay's August 11, 1997, renewed request for reconsideration, the NRC staff offered still another rationale for its apparent conviction that Great Bay is not an "electric utility," pointing again not to the current regulation but to selected excerpts from the statement of considerations

<sup>42</sup> July 23, 1997 Exemption Order at 4.

<sup>43</sup> Id. at 4-5 (emphasis added).



published in 1984 when the current rule was promulgated. The language of the current rule does not, however, prescribe or limit its application to a particular type of rate methodology as argued by the staff. It only requires that the cost of electricity be recovered through rates "established by the entity itself or by a separate regulatory authority." That the NRC's current regulation requires no more is supported by the fact, as set forth above, that NRC has for a decade -- from 1986 to 1996 -- treated both Great Bay and its predecessor, EUA Power, as electric utilities within the meaning of the NRC's regulations notwithstanding their sale of electricity at rates accepted by FERC for filing.<sup>84</sup> Further, Great Bay falls directly within the second sentence of the current definition of electric utilities set forth in 10 C.F.R. § 50.2 which provides that "[i]nvestor-owned utilities, including generation or distribution subsidiaries, . . . are included within the meaning of 'electric utility'." There is no doubt, and NRC has acknowledged, that Great Bay is an investor-owned utility.<sup>85</sup>

For these reasons, Great Bay respectfully requests the Commission to itself finally resolve the correct purpose and scope of the current regulatory definition of

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<sup>84</sup> The Staff argues in the September 18, 1997 letter that Great Bay cannot be an electric utility within the current definition because it does not currently recover all its sunk costs -- i.e. depreciation. But whether Great Bay recovers those costs is not a regulatory concern to the NRC, but solely to its shareholders who by their investment have provided the monies to cover these costs. As an ongoing regulatory matter, the NRC should be solely concerned with whether Great Bay is recovering its operational and decommissioning costs, which is demonstrated in Great Bay's June 4, 1997 Supplement to its petition.

<sup>85</sup> See footnote 2, *supra*.



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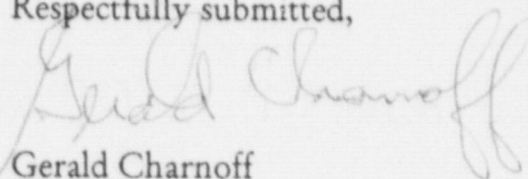
Chairman Jackson

October 20, 1997

Page 7

"electric utility," and determine that Great Bay, under the existing Commission regulations, is an "electric utility." Ever shifting rationales for a regulatory position could diminish public regard for the agency. A Commission determination of this matter could only be salutary.<sup>10/</sup>

Respectfully submitted,



Gerald Charnoff

Counsel for

Great Bay Power Corporation

cc: Nils J. Diaz, Commissioner  
Office of the Commissioners

Greta J. Dicus, Commissioner  
Office of the Commissioners

Edward McGaffigan, Jr., Commissioner  
Office of the Commissioners

Samuel J. Collins  
Director, Office of Nuclear Reactor Regulation

Hubert J. Miller  
Regional Administrator, Region I

<sup>10/</sup>In its petitions for reconsideration, Great Bay had requested oral argument before the Commission on this issue. However, the Director of Nuclear Reactor Regulation expressly denied this request in his September 18, 1997 letter denying Great Bay's request for reconsideration that it is an electric utility under the NRC's current regulations, contending that NRC's processes do not provide an opportunity for oral argument of exemption requests. In fact, however, Great Bay did not seek oral argument on the exemption request; it did seek oral argument on the issue of whether under the current rule it qualifies as an "electrical utility."

Chairman Jackson

October 20, 1997

Page 8

John B. MacDonald  
Senior Resident Inspector, Seabrook

Mr. Albert W. DeAgazio  
Senior NRC Project Manager

Steven R. Hom, Esq.  
NRC Office of General Counsel

Mr. Robert S. Wood  
NRC Office of Nuclear Reactor Regulation

Office of the Secretary  
Document Control Desk