



## NON-CONCURRENCE PROCESS COVER PAGE

The U.S. Nuclear Regulatory Commission (NRC) strives to establish and maintain an environment that encourages all employees to promptly raise concerns and differing views without fear of reprisal and to promote methods for raising concerns that will enhance a strong safety culture and support the agency's mission.

Employees are expected to discuss their views and concerns with their immediate supervisors on a regular, ongoing basis. If informal discussions do not resolve concerns, employees have various mechanisms for expressing and having their concerns and differing views heard and considered by management.

Management Directive, MD 10.158, "NRC Non-Concurrence Process," describes the Non-Concurrence Process (NCP).

The NCP allows employees to document their differing views and concerns early in the decisionmaking process, have them responded to (if requested), and include them with proposed documents moving through the management approval chain to support the decisionmaking process.

NRC Form 757, "Non-Concurrence Process," is used to document the process.

Section A of the form includes the personal opinions, views, and concerns of a non-concurring NRC employee.

Section B of the form includes the personal opinions and views of the non-concurring employee's immediate supervisor.

Section C of the form includes the agency's evaluation of the concerns and the agency's final position and outcome.

NOTE: Content in Sections A and B reflects personal opinions and views and does not represent the official agency's position of the issues, nor official rationale for the agency decision. Section C includes the agency's official position on the facts, issues, and rationale for the final decision.

1. If the process was discontinued, please indicate the reason (and skip to #3):

- Non-concurring employee(s) requested that the process be discontinued
- Subject document was withdrawn

2. At the completion of the process, the non-concurring employee(s):

- Concurred
- Continued to non-concur
- Agreed with some of the changes to the subject document, but continued to non-concur

3. For record keeping purposes:

- This record is non-public and for official use only
- This record has been reviewed and approved for public dissemination

**NON-CONCURRENCE PROCESS (Continued)**

Date  
11/04/2020

**Section A - To Be Completed By Non-Concurring Employee**

2. Title of Subject Document DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - NRC INSPECTION REPORT 05000237/2020090 AND 05000249/2020090	3. ADAMS Accession Number
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4. Document Signer David Curtis	5. Document Signer's Phone Number (Enter 10 numeric digits) (630) 829-9701
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6. Title of Document Signer Deputy Director, Division of Reactor Safety	7. Office (Choose from the drop down list or fill in) RIII
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8. Name of Non-Concurring Employee(s) Lionel Rodriguez	9. Employee's Telephone Number (Enter 10 numeric digits) (630) 829-9609
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10. Title of Non-Concurring Employee Operations Engineer	11. Office (Choose from the drop down list or fill in) RIII
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12.  Document Author     Document Contributor     Document Reviewer     On Concurrence

13. Name of Non-Concurring Employee's Supervisor Patricia Pelke	14. Office (Choose from the drop down list or fill in) RIII
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15. Title of Non-Concurring Employee's Supervisor Branch Chief, Operations Branch	16. Supervisor's Telephone Number (Enter 10 numeric digits) (630) 829-9868
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17.  I would like my non-concurrence considered and would like a written evaluation in Section B and C.  
 I would like my non-concurrence considered, but a written evaluation in Sections B and C is not necessary.

18. When the process is complete, I would like management to determine whether public release of the NCP Form (with or without redactions) is appropriate (Select "No" if you would like the NCP Form to be non-public):  
 Yes     No

19. Reasons for the Non-Concurrence, Potential Impact on Mission, and the Proposed Alternatives

Background: Inspection Report 05000237/2020012 and 05000249/2020012 issued on May 19, 2020, included Apparent Violation 05000237,05000249/2020012-02 for the licensee's failure to have a written evaluation which provided the bases for determining a change made pursuant to 10 CFR 50.59(c) did not require a license amendment. The inspection report cover letter requested the licensee to either attend a pre-decisional enforcement conference or provide a written response to the NRC before the agency made a final enforcement decision for the apparent violation. The licensee decided to provide a written response (ML20184A260) on July 2, 2020, which included, among other items, the: (1) corrective steps taken and results achieved; (2) corrective steps that would be taken; and (3) the date when full compliance was achieved. The statements below are excerpts from the licensee's written response:

Corrective steps taken and results achieved -  
This comprehensive reanalysis was then used to revise the 50.59 evaluation. As discussed below, the revised 50.59 evaluation concluded that these changes can be made without prior NRC approval. This revised 50.59 evaluation corrects the documentation of the technical basis deficiency identified in the Apparent Violation.

Corrective steps that will be taken -  
In addition to the comprehensive reanalysis of the UHS and the revised 50.59 evaluation, several additional actions were identified in the CAPE. Additional actions that will be completed are not corrective actions directly related to

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restoring compliance for the Apparent Violation; these actions are enhancements that ensure organizational learning from this event.

Date when full compliance will be achieved -

Full compliance was achieved on June 29, 2020. The 10 CFR 50.59 Evaluation 2020-02-001, Revision 1 has been approved. The revision was supported by the comprehensive UHS reanalysis and provided the documented technical basis.

Through a review of 10 CFR 50.59 Evaluation 2020-02-001 (the licensee's corrective action intended to restore compliance for the Apparent Violation) and supporting analyses for the evaluation, I determined the evaluation did NOT restore compliance because it did not appropriately consider the design and licensing basis of the facility. After consulting with my management, I reached out to the licensee on July 16, 2020, to ensure a common understanding of the facility design and licensing basis. At that time I was informed by the licensee that they disagreed with my understanding of the facility's design and licensing basis, and that they believed they had appropriately considered it when completing 10 CFR 50.59 Evaluation 2020-02-001. I then reached out to the Division of Reactor Oversight in the Office of Nuclear Reactor Regulation and they agreed with my conclusion on the facility's design and licensing basis.

Two post licensee response panels were held on August 13 and August 20, 2020, to make a final enforcement decision for the apparent violation. At the conclusion of the panel on August 20, 2020, the panel members agreed the apparent violation would be characterized as a SLIV violation and that it would be dispositioned as a Notice of Violation (NOV) because the licensee had not restored compliance. Subsequent to that, the Deputy Division Director of the Division of Reactor Safety in Region III expressed a concern with issuing the SLIV violation as a NOV. I agreed the SLIV violation could be issued as a Non-Cited Violation (NCV) as long as Enforcement Discretion was granted because the criteria for issuing a NCV in accordance with Section 2.3.2.a of the Enforcement Policy were NOT met.

Reasons for the Non-Concurrence: The current version of the document dispositions the SLIV violation as a NCV without using Enforcement Discretion. The reason provided in the document for issuing a NCV is the following:

"Because you [licensee] initiated condition reports demonstrating objective evidence of plans to restore compliance, the violation is being treated as a Non-Cited Violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy."

After reviewing the licensee's written response, supporting analyses and evaluations, and multiple corrective action documents associated with the violation, I determined the licensee had NOT restored compliance for the violation identified. Since this letter (subject of this non-concurrence) provides the final enforcement decision for the apparent violation, it must disposition the violation using the corrective action information available to the agency at this time. Therefore, while the statement above could've been used to disposition the violation as a NCV before July 2, 2020 (before the licensee's written response was received), it is no longer factual because we now know the licensee's plans were NOT successful in restoring compliance. Furthermore, I reviewed currently open corrective actions associated with the violation and did NOT identify any objective evidence of plans for restoring compliance. The fact that the agency opened up Enforcement Action #EA-20-120 to track an additional issue of concern I identified while reviewing the licensee's written response is further evidence that at an agency level, we are not confident the licensee will appropriately restore compliance because they don't understand their design and licensing basis.

To conclude, I am non-concurring on the document because I disagree with the basis provided for dispositioning the violation as a NCV. I do NOT believe the SLIV violation documented in the letter meets the NCV criteria in Section 2.3.2.a of the Enforcement Policy, for the reasons stated above.

Potential Impact on Mission: The potential impact of the decision to disposition the violation as a NCV is that an established agency position is being created with regards to the licensee's corrective actions taken. Specifically, since the agency is already aware of the outcome of the licensee's corrective actions taken to restore compliance,

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the agency is tacitly approving those actions by stating we have objective evidence of plans that would restore compliance. Proceeding with a NCV will unnecessarily create a "Backfit" potential when trying to address the issue of concern related to the licensee's Ultimate Heat Sink design and licensing basis. I believe the safety significance of that issue of concern is greater than the significance of the violation being dispositioned, and appropriately resolving that issue of concern is in the best interest of public health and safety.

Proposed Alternatives:

1. Keep the Apparent Violation open until further inspection is completed to resolve the additional issue of concern identified related to the Ultimate Heat Sink Design and Licensing Basis, then disposition both issues in the same inspection report.
2. Issue the Apparent Violation as a SLIV NOV in accordance with the Enforcement Policy.
3. Issue the Apparent Violation as a SLIV NCV w/ Enforcement Discretion in accordance with the Enforcement Policy.

20. Signature and Date of Non-Concurring Employee

Lionel Rodriguez

 Digitally signed by Lionel Rodriguez  
Date: 2020.11.04 08:22:35 -06'00'

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Date  
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**Section B - To Be Completed By Non-Concurring Employee's Supervisor**

<b>2. Title of Subject Document</b> DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - NRC INSPECTION REPORT 05000237/2020090 AND 05000249/2020090		<b>3. ADAMS Accession Number</b>
<b>4. Name of Non-Concurring Employee's Supervisor</b> Patricia Pelke	<b>5. Office</b> (Choose from the drop down list or fill in) RIII	
<b>6. Title of Non-Concurring Employee's Supervisor</b> Branch Chief, Operations Branch	<b>7. Supervisor's Telephone Number</b> (Enter 10 numeric digits) (630) 829-9868	

**8. Comments for the NCP Reviewer to Consider**  
I am Lionel's current supervisor; however, I was not involved in the inspection nor decision-making process that led to the final action and non-concurrence. I have no comments to offer. For additional information or supervisory comments, please contact Lionel's former supervisor, Karla Stodter, Chief, Engineering Branch 2.

**9. Signature and Date of Non-Concurring Employee's Supervisor**

Patricia J. Pelke

Digitally signed by Patricia J. Pelke  
Date: 2020.11.09 15:55:37 -06'00'

**NON-CONCURRENCE PROCESS (Continued)**

Date  
11/04/2020

**Section C - To Be Completed By NCP Coordinator**

2. Title of Subject Document DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - NRC INSPECTION REPORT 05000237/2020090 AND 05000249/2020090		3. ADAMS Accession Number
4. Name of NCP Coordinator Michael Ziolkowski	5. Office (Choose from the drop down list or fill in) RIII	
6. Title of NCP Coordinator Senior Physical Security Inspector	7. Coordinator's Telephone Number (Enter 10 numeric digits) (630) 829-9723	

8. Agreed Upon Summary of Issues

On May 19, 2020, the NRC issued report 05000237/2020012 and 05000249/2020012 to Dresden Nuclear Power Station Units 2 and 3. This report contained a Green finding and associated Non-cited Violation (NCV) of 10 CFR 50, Appendix B, Criterion III, "Design Control," and an Apparent Violation (AV) of 10 CFR 50.59, "Changes, Tests, and Experiments."

The AV was a result of the licensee's failure to have a written evaluation which provided the bases for determining a change made pursuant to 10 CFR 50.59(c) did not require a license amendment. Specifically, the licensee approved a change to the Updated Final Safety Analysis Report (UFSAR) which reduced the Ultimate Heat Sink (UHS) coping time from four days to 24 hours and UHS volume capacity from two million gallons to one million gallons. This evaluation failed to provide a basis for the determination that the change would not result in more than a minimal increase in the likelihood of occurrence of a malfunction of the Diesel Generator Cooling Water (DGCW) system previously evaluated in the UFSAR. The inspectors concluded the licensee should have obtained a license amendment prior to implementing the proposed change to the UHS required volume and its associated coping time as discussed in the UFSAR. Prior NRC approval is required for changes resulting in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the USFAR.

The ROP's significance determination process does not specifically consider the regulatory process impact in its assessment of licensee performance. Therefore, it is necessary to address this violation, which impedes the NRC's ability to regulate, using traditional enforcement. Section 6.1.d.2 of the Enforcement Policy states that violations of 10 CFR 50.59 resulting from conditions evaluated as having very low safety significance (i.e., green) by the Significance Determination Process (SDP) should be assigned SLIV significance. However, section 2.1.3.D.5 of the Enforcement Manual states that violations will normally be categorized at SLIII if the activity or change required prior NRC approval and the NRC was not likely to approve the change. This section of the Enforcement Manual also states that the Region should convene an enforcement panel to discuss the issue. An enforcement panel was held on April 16, 2020, and the panel decided to issue the 50.59 violation, which had very low safety significance (i.e., green), as an AV that requested a written response before a final NRC determination. The inspection report containing the AV was issued on May 19, 2020.

The licensee provided a written response to the AV on July 2, 2020. In this response, the licensee stated its position on the: (1) corrective steps taken and results achieved; (2) corrective steps that would be taken; and (3) the date when full compliance was achieved. In addition, the licensee provided its reanalysis of the

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UHS capacity calculation and procedural enhancements to replenish the UHS following a postulated failure of the Dresden Lock and Dam. The licensee stated that the procedure revision was supported by the comprehensive UHS reanalysis and provided the documented technical basis. This reanalysis credits 1.8 million gallons of UHS volume and a 3.7-day coping time. The licensee concluded that the revised 50.59 evaluation did not require prior NRC approval.

The inspector reviewed the licensee's response and concluded that the licensee did not restore compliance to the AV because the licensee did not appropriately evaluate changes to the design and licensing basis of the facility in the revised 50.59 evaluation. Specifically, the 10 CFR 50.59 Evaluation 2020-02-001, Revision 1, dated June 29, 2020, evaluated a failure of a dam and indicated that it did not need to consider the additional/coincident impacts of a Loss of Offsite Power (LOOP). Prior to that evaluation, the licensing basis indicated that both events could occur simultaneously. The inspector concluded that 10 CFR 50.59 Evaluation 2020-02-001, Revision 1 effectively changed the licensing basis by removing a coincident LOOP from a dam failure, which would create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report [10 CFR 50.59(c)(2) (vi)]. Specifically, a malfunction of the offsite power system during a dam failure event would now cause an unanalyzed condition to exist because operation of the EDGs during the event was not considered or evaluated. Consequently, the inspector believes the licensee's revised 50.59 evaluation does not restore compliance because it is not a written evaluation which provides the bases for determining the change (removal of the LOOP from the dam failure event) made pursuant to 10 CFR 50.59(c) did not require a license amendment

During the review of the licensee's response to the 50.59 AV, an additional and separate Issue of Concern (IOC) was identified for the licensee's 2012 approval of a change to its UFSAR which removed seismic dam failure (i.e., a dam failure resulting from a seismic event) from the design and licensing basis. This removal was done through a 50.59 screening and was never evaluated in accordance with 10 CFR 50.59(c). The inspector determined this change should also have been evaluated in accordance with 10 CFR 50.59(c) and would have required prior NRC approval.

Neither the licensee's removal of the LOOP coincident with a dam failure (in 2020) nor the removal of the seismic event coincident with a dam failure (in 2012) have been formally dispositioned to the licensee as performance deficiencies. Both issues have been informally communicated to the licensee by the inspector and the branch chief responsible for the inspection activities.

On August 13, 2020, a second enforcement panel was held to discuss the licensee's response. No decision was made at this meeting. On August 20, 2020, a third enforcement panel was held. During this meeting, the Office of Enforcement (OE) informed the panel members that the guidance in section 2.1.3.D.5 of the Enforcement Manual (associating a SLIII significance to a 50.59 violation that would have required prior NRC approval and would likely not have been approved by the NRC) was incorrect. OE stated that the guidance in the Enforcement Policy should have been used and a SLIV significance should be assigned to the 50.59 violation. The panel agreed the dam failure due to a seismic event and LOOP was in the licensee's licensing basis and that no corrective action credit would be provided because the licensee did not believe a LOOP and/or a seismic event coincident with a dam failure was in its design and licensing basis. Therefore, the panel decided to issue the 50.59 violation as a SLIV with a Notice of Violation (NOV) because the updated 50.59 erroneously failed to consider the coincident effects of a LOOP and dam failure, which was within the licensing basis, and, therefore, did not correct the underlying

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noncompliance. The panel also appeared to recognize the 2012 issues with respect to the seismic failure of a dam.

Following the third enforcement panel, the R3 Deputy Director (DD) of the Division of Reactor Safety (DRS) continued to have communications with OE and other members of the enforcement panel regarding the characterization of the 50.59 violation as a NOV. The DDDRS felt uncomfortable with the NOV classification and felt the issue should be treated as a Noncited Violation (NCV). A NCV is a nonrecurring, typically non-willful, SLIV violation or a violation associated with a Green ROP finding that is not subject to formal enforcement action if, for a reactor licensee, the licensee places the violation in a corrective action program to address recurrence and restores compliance within a reasonable period of time. During these communications, the panel members agreed to issue the violation as a SLIV NCV because they believe the licensee was acting in good faith at the time of its submittal, some of the corrective actions the licensee had taken were improvements to the issue that the NRC identified during the 2020 UHS inspection, and the licensee's response would have brought the site into compliance based on the licensees understanding of their licensing and design basis. Specifically, the DDDRS believes the 2012 50.59 IOC has a cascading effect in the history of licensee's design and licensing basis. Until the NRC formally inspects the 2012 IOC and communicates any potential non-compliances to the licensee, the licensee's perspective of its restoration of compliance to the AV is impacted. If the 2012 50.59 evaluation is determined to be inadequate due to the removal of a seismic dam failure, the licensee would be required to review any other evaluations that assumed seismic dam failure was not required and correct them to remain in compliance.

The inspector believes the 50.59 violation cannot be dispositioned as an NCV unless enforcement discretion is applied. Section 2.3.2 of the Enforcement Policy states that for licensees that have implemented a corrective action program that is determined to be adequate by the NRC, the NRC will normally disposition SLIV violations and violations associated with green ROP findings as NCVs if all the criteria in Paragraph 2.3.2.a. are met. Section 2.3.2.a states:

- The licensee must place the violation into a corrective action program to restore compliance and address recurrence.
- The licensee must restore compliance (or demonstrate objective evidence of plans to restore compliance) within a reasonable period of time (i.e., in a timeframe commensurate with the significance of the violation) after a violation is identified.
- For traditional enforcement, the violation must either not be repetitive as a result of inadequate corrective action, or, if repetitive, the repetitive violation must not have been identified by the NRC. This criterion does not apply to violations associated with green ROP findings.
- The violation must not be willful.

After reviewing the licensee's response to the AV, the inspector believes the licensee has not restored compliance or demonstrated objective evidence of plans to restore compliance. Specifically, in its corrective actions to restore compliance to the AV, the licensee effectively changed the licensing basis by removing a coincident LOOP from a dam failure, which would create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the final safety analysis report. The inspector acknowledges that resolving the 2012 50.59 IOC may eventually lead to correction of this issue. However, the inspector believes the removal of a LOOP coincident with a dam failure is a separate performance deficiency that, standing alone, was inappropriately removed from the licensee's design and licensing basis in 10 CFR 50.59 Evaluation 2020-02-001, Revision 1, dated June 29, 2020, the

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corrective action for the AV. The inspector believes, as documented in the licensee's written response to the AV dated July 2, 2020 and through a review of open CAP documents related to the issue, that the licensee has completed its corrective actions associated with restoring compliance to the AV. The inspector also believes the licensee will not take additional corrective actions until it has been formally communicated to the licensee that those corrective actions did not restore compliance to the AV. On November 17, 2020, the licensee submitted a condition report acknowledging gaps in the documentation of the 2012 50.59 IOC which was identified during the review of the licensee's AV response. However, this CR appears to not address the inspectors concerns regarding restoring compliance to the 2020 AV. Specifically, the licensee states that the 10 CFR 50.59 Evaluation 2020-02-001 Revision 1, dated June 29, 2020, which they had previously indicated restores compliance to the AV, removed the discussion of LOOP in UFSAR Section 9.2.5.3.1, and that no additional evaluations are required. The inspector believes the licensee's assertion that no additional evaluations is further evidence that no additional corrective actions will be undertaken to restore compliance for the AV.

The inspector feels that characterizing the 50.59 violation as an NCV is not consistent with the Enforcement Policy and that a NOV characterization is appropriate. The inspector believes that issuing the 50.59 violation as an NCV would be appropriate if enforcement discretion was applied to acknowledge the perceived deviation from the NCV criteria in the Enforcement Policy. The inspector offered an additional outcome which would keep the AV open until further inspection is completed to resolve the additional IOC's related to the UHS design and licensing basis, then disposition all issues in the same inspection report.

In addition to the inspector's belief that issuing the 50.59 violation as a NCV is inconsistent with the Enforcement Policy, the inspector's major concern is that dispositioning the violation as an NCV has the potential of establishing an agency position regarding the licensee's corrective actions taken. Specifically, since the agency is already aware of the outcome of the licensee's corrective actions taken to restore compliance, the agency is tacitly approving those actions by stating the licensee-initiated condition reports demonstrating objective evidence of plans to restore compliance. Proceeding with an NCV will unnecessarily create a "Backfit" potential when trying to address the IOC related to the licensee's Ultimate Heat Sink design and licensing basis.

**9. Evaluation of Non-Concurrence and Rationale for Decision**

The DRE 50.59 UHS AV has been the subject of three enforcement panels. The third panel concluded to issue the 50.59 AV as a SLIV NOV. Following this last panel, the DDDRS continued to have communications with panel members and OE to discuss the appropriateness of NOV classification. During these communications, it was decided that there was flexibility in the Enforcement Policy to support the 50.59 AV to be issued as an NCV. Specifically, to receive the NCV classification, the licensee must enter the issue into its CAP and restore compliance (or demonstrate objective evidence of plans to restore compliance) within a reasonable amount of time. The licensee has entered this issue into its CAP and the licensee believes it has restored compliance based in its understanding of its UHS design and licensing basis. The potential performance deficiencies identified during the NRC's review of the licensee's response to the 50.59 AV have not been formally communicated to the licensee. Once the IOC's that were identified during the review of the licensee's response to the AV are inspected and the results are formally communicated to the licensee, the NRC can take enforcement actions as appropriate.

In response to the inspector's potential backfit concern, the DDDRS believes the letter, which is the basis

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for this non-concurrence, does not take a position on whether the licensee has restored compliance for the AV. The DDRS believes the licensee should be notified with a separate violation and provided the opportunity to respond if the NRC determines that removal of the LOOP coincident with a dam from the licensee's design and licensing basis was done inappropriately. The letter explicitly states staff's view that the response provided by the licensee raised an issue of concern about Dresden's licensing basis that will be followed-up on during future inspection activities. This assertion, accompanied by the inherent nature and flexibility of the NRC's approach to its risk informed inspection program, leads the DDRS to believe future inspections or future potential non-compliances related to the licensee's UHS design and licensing basis would not be impeded.

The DDRS considered the inspector's concerns associated with the classification of the 50.59 AV as an NCV and has taken the inspector's proposed recommendations into careful consideration. Although the inspector's proposed outcomes were not taken, those alternate views added depth and perspective to the decision-making process. All parties acknowledge the complexity of this issue and feel that their respective positions support safety. This issue helped identify a discrepancy in the Enforcement Manual. There are current agency efforts in progress seeking Commission approval on gaining alignment with the Enforcement Policy and Enforcement Manual. There are additional agency efforts in progress reviewing the Significance and Enforcement Review Panel (SERP) process. Both initiatives could add clarity to future similar issues. Although the decision regarding the approach in issuing the 50.59 AV as an NCV without a deviation is not uniformly agreed upon, this approach is acceptable, meets the Enforcement Policy, and the effort towards resolution may directly and indirectly improve how these types of issues are handled in the future.

10. Signature and Date of NCP Coordinator

Michael E. Ziolkowski

 Digitally signed by Michael E. Ziolkowski  
Date: 2020.12.04 11:33:25 -06'00'

11. Signature and Date of NCP Approver

David Curtis

 Digitally signed by David Curtis  
Date: 2020.12.07 14:08:40 -06'00'