



PACIFIC NORTHWEST LAW LLP  
LITIGATION AND CONSULTING

March 15, 2021

George Wilson  
Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-001

*by email: George.Wilson@nrc.gov*

Re: Dr. Melinda Krahenbuhl  
Confirmatory Order Related to NRC Investigation Reports 4-2016-022  
and 4-2017-023, Dated July 27, 2020

Dear Director Wilson,

On behalf of my client, Dr. Melinda Krahenbuhl, I write to provide a report of her progress meeting the commitments memorialized in the referenced Confirmatory Order. Under the terms of the Order, it is our understanding that she will be eligible to resume NRC licensed activities and employment tomorrow. We want to confirm that understanding before she proceeds. We request, based on her good faith efforts, that you find good cause to relax the requirements that could require the Order to remain in place for an indefinite period.

- I. Dr. Krahenbuhl has met the commitments that were possible for her to meet by today's date.
  - A. She presented the approved outline at the TRTR Annual Conference September 28, 2020. On October 28, 2020, she submitted the approved article to TRTR for publication in its newsletter and, on December 8, 2020, she submitted the article to ANS for publication in its newsletter. She is slated to make her second presentation when the Utah Health Physics Society resumes meeting but the organization has been largely dormant during the pandemic.

George Wilson  
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U.S. Nuclear Regulatory Commission  
March 15, 2021  
Page 2 of 3

- B. She submitted recommendations for a redraft of ANSI/ANS 15.4, after advance review by the NRC, to ANSI/ANS September 4, 2020. Leo Brobeck, who chairs the subcommittee that received the recommendations, provided this update March 1, 2021, “The plan is for an updated draft of 15.4 to be submitted by the working group later this month to the ANS 15 subcommittee for review, and if approved, then onto to the ANS Research and Advanced Reactors Consensus Committee for their review.”
- C. She retained an executive coach August 2, 2020 and has worked steadily with her coach the past seven and a half months. Her report of her progress is attached here.

Note: We are requesting that she be excused from submitting a second report in August, if that would hold the Confirmatory Order open for an additional period of time. We believe she has substantially complied with the commitments she made in it. She hopes to be in a position, this month, to tell prospective employers that she successfully complied with the Confirmatory Order and the matter is closed.

- D. She has not applied for any NRC licensed position but is prepared to do so. She is immediately slated to resume service on committees that address NRC licensed activities. As indicated above, one of our goals in writing today is to confirm that you consider her eligible to do so now.
- II. Request for Relaxation and a Determination that Dr. Krahenbuhl has successfully completed her commitments under the Confirmatory Order.

Dr. Krahenbuhl requests relaxation of the Confirmatory Order, sufficient to determine that her compliance with the Order is now complete. She will continue to meet with her executive coach through the spring and early summer. She will continue to consult with ANS/ANSI, as the committees request, regarding her rule change recommendations. When the Utah Health Physics Society resumes meeting, she will make her final presentation of the approved outline.

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George Wilson  
Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
March 15, 2021  
Page 3 of 3

This has been an unusually difficult year for the organizations, also, so we request that her good faith efforts to complete the steps outlined be deemed sufficient to constitute full compliance.

Thank you for reaching a constructive resolution of this matter.

Very Truly Yours,



Kristen L. Winemiller

**Enclosure withheld from public disclosure in  
accordance with 10 CFR 2.390(a)(6)**