



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 3, 2021

Mr. Cleveland Reasoner  
Chief Executive Officer and  
Chief Nuclear Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION, UNIT 1 - ISSUANCE OF  
AMENDMENT NO. 230 RE: REVISION OF TECHNICAL SPECIFICATION 3.6.3  
AND SURVEILLANCE REQUIREMENT 3.6.3.1 TO ALLOW USE OF A BLIND  
FLANGE (EPID L-2020-LLA-0249)

Dear Mr. Reasoner:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 230 to Renewed Facility Operating License No. NPF-42 for the Wolf Creek Generating Station, Unit 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated November 10, 2020.

The amendment revises TS 3.6.3, "Containment Isolation Valves," Condition D, to allow the use of a blind flange for Required Action D.1. In addition, a change to Surveillance Requirement (SR) 3.6.3.1 allows the use of a blind flange.

A copy of the related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

*/RA/*

Samson S. Lee, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosures:

1. Amendment No. 230 to NPF-42
2. Safety Evaluation

cc: Listserv



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION, UNIT 1

DOCKET NO. 50-482

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 230  
License No. NPF-42

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Wolf Creek Generating Station, Unit 1 (the facility) Renewed Facility Operating License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated November 10, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-42 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 230, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No 229, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L. Dixon-Herrity, Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License and  
Technical Specifications

Date of Issuance: September 3, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 230 TO  
RENEWED FACILITY OPERATING LICENSE NO. NPF-42  
WOLF CREEK GENERATING STATION, UNIT 1  
DOCKET NO. 50-482

Replace the following pages of the Renewed Facility Operating License No. NPF-42 and Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE  
4

INSERT  
4

Technical Specifications

REMOVE  
3.6-10  
3.6-11

INSERT  
3.6-10  
3.6-11

- (5) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission, now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level
- The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.
- (2) Technical Specifications and Environmental Protection Plan
- The Technical Specifications contained in Appendix A, as revised through Amendment No. 230, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 229, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
- (3) Antitrust Conditions
- Evergy Kansas South, Inc. and Evergy Metro, Inc. shall comply with the antitrust conditions delineated in Appendix C to this license.
- (4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)\*
- Deleted per Amendment No. 141.

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\*The parenthetical notation following the title of many license conditions denotes the section of the supporting Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. One or more penetration flow paths with one or more containment purge valves not within leakage limits.</p>	<p>D.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>D.2 -----NOTES-----            1. Isolation devices in high radiation areas may be verified by use of administrative means.            2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means.            -----            Verify the affected penetration flow path is isolated.</p> <p><u>AND</u></p>	<p>24 hours</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p> <p>(continued)</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. (continued)	D.3 Perform SR 3.6.3.6 or SR 3.6.3.7 for the resilient seal purge valves closed to comply with Required Action D.1.	Once per 92 days
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3.	6 hours
	<u>AND</u> E.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.1 Verify each containment shutdown purge valve is sealed closed or closed and blind flange installed except for one purge valve in a penetration flow path while in Condition D of this LCO.	In accordance with the Surveillance Frequency Control Program  <u>AND</u> Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment

(continued)



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 230 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-42

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION, UNIT 1

DOCKET NO. 50-482

1.0 INTRODUCTION

By application dated November 10, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20315A433), Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) requested changes to the Technical Specifications (TSs) for Wolf Creek Generating Station, Unit 1 (Wolf Creek).

The proposed changes would modify TS 3.6.3, "Containment Isolation Valves," Condition D, to allow the use of a blind flange for Required Action D.1. In addition, a proposed change to Surveillance Requirement (SR) 3.6.3.1 would allow the use of a blind flange.

2.0 REGULATORY EVALUATION

2.1 System Description

The containment isolation valves form part of the containment pressure boundary and provide fluid penetration flow paths with two isolation barriers that are closed on a containment isolation signal.

The containment purge and exhaust system operates to supply outside air into the containment for ventilation and cooling or heating needed for prolonged containment access following a shutdown and during refueling. The system may also be used to reduce the concentration of noble gases within containment prior to and during personnel access.

The containment purge supply and exhaust lines each contain two isolation valves (one inside and one outside containment). The safety analyses assume that the 36-inch shutdown purge valves are closed at event initiation. The containment purge supply and exhaust isolation valves are normally sealed closed in Modes 1, 2, 3, and 4 to ensure the containment boundary is maintained.

The mini-purge system operates to reduce the concentration of noble gases within the containment prior to and during personnel access or to equalize internal and external pressures.



The mini-purge system shares the containment penetration piping with the containment purge and exhaust system. The mini-purge system branches off the containment purge and exhaust system line and has its own 18-inch containment isolation valves. The supply and exhaust lines each contain two isolation valves (one inside and one outside containment). Since the 18-inch valves used in the mini-purge system are designed to meet the requirements for automatic containment isolation valves, these valves may be opened as needed, for a limited time as specified in procedures, in Modes 1, 2, 3, and 4. Containment purge valves refer to both the containment purge and exhaust system and mini-purge isolation valves.

Flanges are installed inboard of the inside containment isolation valves and outboard of the outside containment isolation valves to facilitate leak rate testing of the valves.

## 2.2 Description of Proposed TS Changes

Current TS Limiting Condition for Operation (LCO) 3.6.3 requires that each containment isolation valve shall be operable. This LCO is applicable in Modes 1, 2, 3, and 4. TS LCO 3.6.3, Condition D states that, "One or more penetration flow paths with one or more containment purge valves not within leakage limits." Condition D is entered when this stated condition is met.

TS LCO 3.6.3, Condition D, Required Action D.1 currently states:

Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve or closed manual valve.

Required Action D.1 has a Completion Time of 24 hours.

SR 3.6.3.1 currently states:

Verify each containment purge valve is sealed closed except for one purge valve in a penetration flow path while in Condition D of this LCO.

The blind flanges that are installed adjacent to the containment purge isolation valves could be used to provide containment isolation if one or more isolation valves experience leakage beyond acceptable limits. However, these blind flanges previously were designed and constructed in accordance with codes and standards not consistent with the safety-related requirement for containment penetration isolation, and therefore, could not be relied upon for use in Required Action D.1 and SR 3.6.3.1 above.

The piping beyond the containment isolation valves, up to and including the blind flanges, has been reclassified as safety-related. Therefore, this reclassification will allow the use of blind flanges for Required Action D.1 and SR 3.6.3.1 to maintain containment isolation if one or more isolation valves have leakage rates above acceptable limits.

### Proposed changes:

The licensee's proposed change to LCO 3.6.3, Condition D, Required Action D.1 would state:

Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.

The licensee proposed change to SR 3.6.3.1 would state:

Verify each containment shutdown purge valve is sealed closed or closed and blind flange installed except for one purge valve in a penetration flow path while in Condition D of this LCO.

### 2.3 Regulatory Requirements

The following regulatory requirements apply to the containment purge and exhaust system and mini-purge system containment penetrations:

- General Design Criterion (GDC) 2, "Design bases for protection against natural phenomena," of Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 states, in part:

Structures, systems, and components important to safety shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunamis, and seiches without loss of the capability to perform their safety functions.

- GDC 54, "Piping systems penetrating containment," of Appendix A to 10 CFR Part 50, states:

Piping systems penetrating primary reactor containment shall be provided with leak detection, isolation and containment capabilities having redundancy, reliability, and performance capabilities which reflect the importance to safety of isolating these piping systems. Such piping systems shall be designed with a capability to test periodically the operability of the isolation valves and associated apparatus and to determine if valve leakage is within acceptable limits.

- GDC 56, "Primary containment isolation," of Appendix A to 10 CFR Part 50 requires, in part, that each line that connects directly to the containment atmosphere and penetrates primary reactor containment shall be provided with containment isolation valves as follows:

- (1) One locked closed isolation valve inside and one locked closed isolation valve outside containment; or
- (2) One automatic isolation valve inside and one locked closed isolation valve outside containment; or
- (3) One locked closed isolation valve inside and one automatic isolation valve outside containment; or
- (4) One automatic isolation valve inside and one automatic isolation valve outside containment.

There will be no changes to the containment purge and exhaust system or mini-purge system containment penetrations such that compliance with all of the above regulatory requirements remains unchanged.

The regulations in 10 CFR 50.36, "Technical specifications," require that TSs contain LCOs that define the lowest functional capability or performance levels of equipment necessary for safe operation of the plant. The regulations in 10 CFR 50.36 also require that SRs be established that provide assurance that the necessary quality of systems and components is maintained, facility operation will be within safety limits, and that the LCOs will be met.

### 3.0 TECHNICAL EVALUATION

The licensee submitted a previous license amendment request (LAR), dated February 25, 2019 (ADAMS Accession No. ML19064A591), to remove the use of blind flanges from TS LCO 3.6.3 and SR 3.6.3.1. The U.S. Nuclear Regulatory Commission (NRC) approved this change in License Amendment No. 223 issued with a safety evaluation, dated January 6, 2020 (ADAMS Accession No. ML19311C643). This was necessary because the blind flanges were found not to be safety-related, and therefore, could not be relied upon for containment isolation.

In the present LAR, dated November 10, 2020, the licensee provided the following justifications to reclassify the piping beyond the containment isolation valves, up to and including the blind flanges, as safety-related. This safety reclassification will justify the use of blind flanges for TS LCO 3.6.3 and SR 3.6.3.1, and that the blind flanges can be relied upon for containment isolation.

#### Safety Classification Analysis

In Section 3.0, "Technical Evaluation," of the LAR, the licensee stated:

Subsequent to issuance of License Amendment 223, WCNOE Engineering performed Change Package 20390, along with Safety Classification Analysis (SCA) 20-0004. These provided the evaluation and justification for reclassifying the piping beyond the containment isolation valves, up to and including the blind flanges, as safety-related. These evaluations apply to both the Containment Purge Supply and Exhaust System as well as the Mini-purge System. The evaluations provide the following justifications:

- 1) The material specifications, used for both the American Society of Mechanical Engineers (ASME) Class 2 and American National Standards Institute (ANSI) B31.1, "Power Piping," portions of piping up to and including the flanges identify the same materials were used for both. In addition, because the ANSI portions were identified as Special Scope, Certified Materials Test Reports (CMTRs) were provided during construction for those sections of piping.
- 2) The ANSI portions of piping up to, and including the flanges, are within the seismic restraints and are bounded by the seismic evaluation for the Seismic Category I section of piping.
- 3) The ASME and ANSI materials (e.g., piping, flanges, fittings, etc.) used in construction of the containment isolation piping are the same as the piping beyond the isolation valve up to and including the flanges. As such, the SCA documents that the only credible failure mechanism is a seismic event. Because the seismic evaluation bounds the ANSI portions of piping, the

containment isolation function would be maintained in the event of a design basis seismic event.

Based on SCA 20-0004, the licensee proposes to return TS LCO 3.6.3, Required Action D.1 and SR 3.6.3.1 to their state prior to License Amendment No. 223 such that the blind flanges may be used to satisfy TS LCO 3.6.3, Condition D, Required Action D.1 and SR 3.6.3.1.

#### NRC Regulatory Guide 1.141

NRC Regulatory Guide (RG) 1.141, Revision 1, "Containment Isolation Provisions for Fluid Systems," dated July 2010 (ADAMS Accession No. ML092850042), provides guidance for licensees in meeting GDCs 54 to 56 for containment isolation. RG 1.141 endorses ANSI N271 (1976), "Containment Isolation Provisions for Fluid Systems," as the basis for the design requirements for containment isolation.

The licensee has determined that the blind flanges meet the criteria of relevant sections of ANSI N271 (1976). In Section 3.0 of the LAR, the licensee stated:

#### Section 3.2 [ANSI N271 (1976)]: Containment Isolation Barriers

Blind flanges are listed as one of several acceptable types of mechanical isolation barriers.

#### Section 3.3: General Design Criteria

Change Package 20390 and SCA 20-0004 provide the evaluations and justification for reclassifying the piping as safety-related, such that the blind flanges and associated piping meet GDC 54-[56].

#### Section 4.4.10: Containment Isolation Barrier Design; Safety Class

Containment isolation barriers which are not part of the reactor coolant pressure boundary shall be at least Safety Class 2 in accordance with ANSI N18.2-1973, N18.2a-1975. [ANSI] N-18.2 correlates safety classifications to ASME classifications (e.g., Safety Class 2 is equivalent to ASME Class 2).

The portion of the piping between the containment isolation valves uses ASME Class 2 criteria, while the blind flanges and its piping were designed and constructed to ANSI B31.1 [criterion]. However, a review of the material specifications shows the materials are the same for both the ANSI and ASME portions of the piping. In addition, review of the original construction documents shows the piping was installed to meet the construction requirements for Special Scope, which requires additional documentation, such as CMTRs.

The SCA for the piping evaluates the credible failure modes and safety significance. The SCA determined the piping and blind flange are safety-related and that seismic event is the only credible failure mode. The blind flange and piping are within the analyzed seismic boundary. The piping analysis performed for this system shows that the piping extending out to the blind flanges is all seismically qualified.

Although the materials, installation, and design are not ASME Class 2, the available documentation, design, credible failure mode, and evaluations/analyses show that the installed ANSI B31.1 blind flange and piping provide reasonable assurance that the piping will perform the design function of maintaining containment integrity during and following a seismic event.

#### Section 4.5.3: Isolation Barrier Protection; Earthquakes

Containment isolation valves are designated as Seismic Category I. Containment isolation provisions shall be capable of operation during the Safe Shutdown Earthquake and of maintaining the isolation function afterwards. Because the ANSI piping up to and including the blind flanges are bounded by the seismic analysis performed for the containment penetrations, there is reasonable assurance that containment isolation would be maintained by the blind flanges in the case of a seismic event.

#### Section 4.10 Flanged Closures

Flanged closures (blinds) are administratively controlled and are to be tested in accordance with Appendix J. The portions of the piping will be added to the Appendix J testing programs as necessary.

#### Section 7 Materials

Isolation barriers and piping between them shall meet the material requirements for metal parts as specified by ASME B&PV [Boiler and Pressure Vessel] Code, Section III, Division 1, Subsection NA. The SCA and change package document that ASME B&PV Code, Section III, Division 1, Subsection NA allows for material that is produced under an ASTM [American Society for Testing and Materials] specification may be accepted as complying with the corresponding ASME specification provided the ASME specification is designated as being identical with the ASTM specification for the grade, class, or type produced and provided that the material is confirmed as complying with the ASTM specification by a CMTR or Certification from the Material Manufacturer. From the available construction documentation, the ANSI portions of piping up to and including the blind flanges were the same materials as those used for the ASME portions. In addition, these sections of piping were designated as special scope to ensure the material and workmanship met seismic requirements. Therefore, the portions of the ANSI piping up to and including the blind flanges provide reasonable assurance that containment isolation would be preserved during and following a seismic event.

The licensee's evaluation supporting this LAR shows that, although the blind flanges and associate piping are designed and constructed to ANSI 31.1, not ASME Safety Class 2, the material specification is the same as the safety-related piping, and the ANSI piping, including the blind flanges, is bounded by the safety-related seismic analysis. The licensee's evaluation also shows the blind flanges meet the guidance in RG 1.141. Based on the staff's review of the licensee's evaluation relating to SCA 20-0004, RG 1.141 and ANSI N271 (1976), the NRC staff finds that the licensee's proposed reclassification of the blind flanges to safety-related and seismic Category I is acceptable. The bases for the staff finding are the justifications for the material specifications between ASME Class 2 and ANSI B31.1 being equivalent, the CMTRs

report, seismic Category I for ANSI portions of the piping, the SCA safety-related re-classification, and 10 CFR Part 50 Appendix J testing as described above. In addition, from a risk insights perspective, the NRC staff believes this amendment enhances safety by providing plant operators an additional valid means to isolate containment should one or more isolation valves experience leakage beyond acceptable limits. Therefore, the proposed changes of using blind flanges for containment isolation in TS LCO 3.6.3 and SR 3.6.3.1 are acceptable.

### 3.1 Technical Conclusion

Based on Section 3.0 above, the NRC staff finds the proposed changes acceptable. The Seismic Category I blind flanges meet GDC 2 requirements and can be used for TS LCO 3.6.3 to satisfy the GDC 56 requirement for two isolation barriers, including blind flanges for each containment penetration, and for SR 3.6.3.1 to satisfy GDC 54 requirements for redundancy, reliability, performance, and leak detection. The proposed changes also continue to meet the requirements of 10 CFR 50.36 for LCOs and SRs.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Kansas State official was notified of the proposed issuance of the amendment on March 11, 2021. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, published in the *Federal Register* on January 26, 2021 (86 FR 7118), and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: C. Li, NRR  
S. Smith, NRR

Date: September 3, 2021

SUBJECT: WOLF CREEK GENERATING STATION, UNIT 1 - ISSUANCE OF AMENDMENT NO. 230 RE: REVISION OF TECHNICAL SPECIFICATION 3.6.3 AND SURVEILLANCE REQUIREMENT 3.6.3.1 TO ALLOW USE OF A BLIND FLANGE (EPID L-2020-LLA-0249) DATED SEPTEMBER 3, 2021

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