

**UNITED STATES COURT OF APPEALS FOR THE  
DISTRICT OF COLUMBIA CIRCUIT**

BEYOND NUCLEAR, INC.,	)	
	)	
Petitioner,	)	Case No. 21-1056
	)	
v.	)	Consolidated with Nos.
	)	21-1048, 21-1055, and 21-1179
UNITED STATES NUCLEAR REGULATORY COMMISSION and the UNITED STATES OF AMERICA,	)	
	)	
Respondents.	)	
	)	

**AMENDED PETITION FOR REVIEW**

Pursuant to 42 U.S.C. § 2239, 28 U.S.C. § 2344, 5 U.S.C. § 702, 42 U.S.C. § 10139, Fed. R. App. P. 15(a), and D.C. Cir. Rule 15(a), Petitioner Beyond Nuclear, Inc., through its undersigned counsel, hereby amends its petition for review in this proceeding.<sup>1</sup> This amended petition seeks review of the issuance by the United States Nuclear Regulatory Commission (the “NRC” or “Commission”) of a license to build and operate the WCS Consolidated Interim Storage Facility, published at

---

<sup>1</sup> The court docketed Beyond Nuclear’s original Petition for Review on February 10, 2010, in *Beyond Nuclear v. U.S. Nuclear Regulatory Commission and United States of America*, No. 21-1056. The court subsequently consolidated this case with three others, and captioned it *Don’t Waste Michigan, et al. v. U.S. Nuclear Regulatory Commission and United States of America*, No. 21-1048 (consolidated with Nos. 21-1055, 21-1056, and 21-1179).

86 Fed. Reg. 51,926 (Sept. 17, 2021) (“License Issuance”). A copy of the Federal Register notice is attached.

The License Issuance appealed by this Amended Petition for Review completes the NRC’s action on Interim Storage Partner’s (“ISP’s”) license application and constitutes the third and last NRC decision of which Petitioner seeks review. With this Amended Petition, Beyond Nuclear now seeks review of the License Issuance and two previous NRC decisions: a Commission Order issued on October 29, 2018 (“2018 Order”) and Memorandum and Order CLI-20-14, issued on December 17, 2020 (“CLI-20-14”).

Petitioner seeks review of these three NRC decisions on the grounds that they violate the Nuclear Waste Policy Act (“NWPA”), 42 U.S.C. §§ 10222(a)(5)(A) and 10143, and the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 706(2)(A) and (C). Petitioner contends that in the 2018 Order, the NRC violated the NWPA and the APA by refusing to dismiss an administrative proceeding that contemplated issuance of a license permitting federal ownership of used reactor fuel at a commercial fuel storage facility. Petitioner also contends that the NRC violated the NWPA and the APA in CLI-20-14 by ruling that the application under review in the proceeding was lawful and by refusing to grant Petitioner a hearing on the question of whether the NRC is prohibited by the APA from issuing a license that contains provisions that would violate the NWPA if

implemented. Finally, Petitioner contends that the License Issuance violated the NWPA and the APA.

Accordingly, Petitioner respectfully requests this Court review, reverse, and vacate the 2018 Order, CLI-20-14, and the License Issuance and grant any other remedies that may be appropriate.

This filing is timely because it is made within the 60-day period established by the Hobbs Act, 28 U.S.C. § 2344, for bringing a petition for judicial review of a final agency action. The License Issuance was noticed within the last 60 days, and renders final and ripe all other orders issued against Beyond Nuclear in the underlying proceeding, including the 2018 Order and CLI-20-14. Venue is appropriate within the D.C. Circuit pursuant to 28 U.S.C. § 2343.

Finally, because none of Petitioners' legal claims are altered by this Amended Petition for Review, it will not impact the proposed word limits and briefing schedule set out in the Joint Motion to Govern Future Proceedings filed on October 12, 2021.

Respectfully Submitted,

\_\_\_\_\_/signed electronically by/\_\_\_\_

Diane Curran

Harmon, Curran, Spielberg, & Eisenberg, L.L.P.

1725 DeSales Street N.W., Suite 500

Washington, D.C. 20036

240-393-9285

Email: dcurran@harmoncurran.com

\_\_\_\_\_/signed electronically by/\_\_\_\_

Mindy Goldstein

Turner Environmental Law Clinic

Emory University School of Law

1301 Clifton Road

Atlanta, GA 30322

404-727-3432

Email: magolds@emory.edu

Counsel for Petitioner

November 4, 2021

comments from private citizens and industry organizations. The NRC staff's evaluation and resolution of the public comments are documented in ADAMS under Accession No. ML21211A578.

**III. Congressional Review Act**

NUREG-1021, Revision 12, is a rule as defined in the Congressional Review Act (5 U.S.C. 801-808). However, the Office of Management and Budget has not found it to be a major rule as defined in the Congressional Review Act.

Dated: September 14, 2021.

For the Nuclear Regulatory Commission.

**Christian B. Cowdrey,**  
Chief, Operator Licensing and Human Factors Branch, Division of Reactor Oversight, Office of Nuclear Reactor Regulation.

[FR Doc. 2021-20171 Filed 9-16-21; 8:45 am]

BILLING CODE 7590-01-P

**NUCLEAR REGULATORY COMMISSION**

[NRC-2021-0001]

**Sunshine Act Meetings**

**TIME AND DATE:** Weeks of September 20, 27, October 4, 11, 18, 25, 2021.

**PLACE:** Commissioners' Conference Room, 11555 Rockville Pike, Rockville, Maryland.

**STATUS:** Public.

**MATTERS TO BE CONSIDERED:**

**Week of September 20, 2021**

There are no meetings scheduled for the week of September 20, 2021.

**Week of September 27, 2021—Tentative**

*Thursday, September 30, 2021*

9:00 a.m. Strategic Programmatic Overview of the Operating Reactors and New Reactors Business Lines (Public Meeting); (Contact: Candace De Messieres: 301-415-8395)

*Additional Information:* Due to COVID-19, there will be no physical public attendance. The public is invited to attend the Commission's meeting live by webcast at the Web address—<https://video.nrc.gov/>.

**Week of October 4, 2021—Tentative**

*Tuesday, October 5, 2021*

10:00 a.m. Meeting with the Advisory Committee on the Medical Uses of Isotopes (Public Meeting); (Contact: Don Lowman: 301-415-5452)

*Additional Information:* Due to COVID-19, there will be no physical public attendance. The public is invited to attend the Commission's meeting live

by webcast at the Web address—<https://video.nrc.gov/>.

*Friday, October 8, 2021*

10:00 a.m. Meeting with the Advisory Committee on Reactor Safeguards (Public Meeting); (Contact: Larry Burkhardt: 301-287-3775)

*Additional Information:* Due to COVID-19, there will be no physical public attendance. The public is invited to attend the Commission's meeting live by webcast at the Web address—<https://video.nrc.gov/>.

**Week of October 11, 2021—Tentative**

There are no meetings scheduled for the week of October 11, 2021.

**Week of October 18, 2021—Tentative**

There are no meetings scheduled for the week of October 18, 2021.

**Week of October 25, 2021—Tentative**

*Thursday, October 28, 2021*

10:00 a.m. Meeting with the Organization of Agreement States and the Conference of Radiation Control Program Directors (Public Meeting); (Contact: Celimar Valentin-Rodriguez: 301-415-7124)

*Additional Information:* Due to COVID-19, there will be no physical public attendance. The public is invited to attend the Commission's meeting live by webcast at the Web address—<https://video.nrc.gov/>.

**CONTACT PERSON FOR MORE INFORMATION:**

For more information or to verify the status of meetings, contact Wesley Held at 301-287-3591 or via email at [Wesley.Held@nrc.gov](mailto:Wesley.Held@nrc.gov). The schedule for Commission meetings is subject to change on short notice.

The NRC Commission Meeting Schedule can be found on the internet at: <https://www.nrc.gov/public-involve/public-meetings/schedule.html>.

The NRC provides reasonable accommodation to individuals with disabilities where appropriate. If you need a reasonable accommodation to participate in these public meetings or need this meeting notice or the transcript or other information from the public meetings in another format (e.g., braille, large print), please notify Anne Silk, NRC Disability Program Specialist, at 301-287-0745, by videophone at 240-428-3217, or by email at [Anne.Silk@nrc.gov](mailto:Anne.Silk@nrc.gov). Determinations on requests for reasonable accommodation will be made on a case-by-case basis.

Members of the public may request to receive this information electronically. If you would like to be added to the distribution, please contact the Nuclear Regulatory Commission, Office of the

Secretary, Washington, DC 20555, at 301-415-1969, or by email at [Tyesha.Bush@nrc.gov](mailto:Tyesha.Bush@nrc.gov) or [Betty.Thweatt@nrc.gov](mailto:Betty.Thweatt@nrc.gov).

The NRC is holding the meetings under the authority of the Government in the Sunshine Act, 5 U.S.C. 552b.

Dated: September 15, 2021.

For the Nuclear Regulatory Commission.  
**Wesley W. Held,**

*Policy Coordinator, Office of the Secretary.*

[FR Doc. 2021-20296 Filed 9-15-21; 4:15 pm]

BILLING CODE 7590-01-P

**NUCLEAR REGULATORY COMMISSION**

[Docket No. 72-1050; NRC-2016-0231]

**Interim Storage Partners, LLC; WCS Consolidated Interim Storage Facility; Issuance of Materials License and Record of Decision**

**AGENCY:** Nuclear Regulatory Commission.

**ACTION:** License and record of decision; issuance.

**SUMMARY:** The U.S. Nuclear Regulatory Commission (NRC) has issued Materials License No. SNM-2515 to Interim Storage Partners, LLC (ISP) to construct and operate the WCS Consolidated Interim Storage Facility (CISF) as proposed in its license application, as amended, and to receive, possess, store, and transfer spent nuclear fuel and Greater-than-Class-C radioactive waste at the WCS CISF in Andrews County, Texas. ISP will be required to operate under the conditions listed in Materials License No. SNM-2515. The NRC staff has published a record of decision (ROD) that supports the NRC's decision to approve ISP's license application for the WCS CISF and to issue the license.

**DATES:** September 17, 2021.

**ADDRESSES:** Please refer to Docket ID NRC-2016-0231 when contacting the NRC about the availability of information regarding this document. You may access publicly available information related to this document using any of the following methods:

- *Federal Rulemaking Website:* Go to <https://www.regulations.gov> and search for Docket ID NRC-2016-0231. Address questions about Docket IDs in *Regulations.gov* to Stacy Schumann; telephone: 301-415-0624; email: [Stacy.Schumann@nrc.gov](mailto:Stacy.Schumann@nrc.gov). For technical questions, contact the individual listed in the **FOR FURTHER INFORMATION CONTACT** section of this document.

- *NRC's Agencywide Documents Access and Management System (ADAMS):* You may access publicly

available documents online in the ADAMS Public Documents collection at <https://www.nrc.gov/reading-rm/adams.html>. To begin the search, select "Begin Web-based ADAMS Search." For problems with ADAMS, please contact the NRC's Public Document Room (PDR) reference staff at 1-800-397-4209, 301-415-4737, or by email to [pdr.resource@nrc.gov](mailto:pdr.resource@nrc.gov). The ADAMS accession number for each document referenced (if it is available in ADAMS) is provided the first time that it is mentioned in this document. In addition, for the convenience of the reader, the ADAMS accession numbers are provided in a table in the section of this document entitled, **SUPPLEMENTARY INFORMATION**.

• **Attention:** The PDR, where you may examine and order copies of public documents, is currently closed. You may submit your request to the PDR via email at [pdr.resource@nrc.gov](mailto:pdr.resource@nrc.gov) or call 1-800-397-4209 or 301-415-4737, between 8:00 a.m. and 4:00 p.m. (ET), Monday through Friday, except Federal holidays.

**FOR FURTHER INFORMATION CONTACT:** John-Chau Nguyen, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; telephone: 301-415-0262; email: [John-Chau.Nguyen@nrc.gov](mailto:John-Chau.Nguyen@nrc.gov).

**SUPPLEMENTARY INFORMATION:**

**I. Discussion**

The NRC has issued a license to ISP for its WCS CISF in Andrews County, Texas (ADAMS Package Accession No. ML21188A096). Materials License No. SNM-2515 authorizes ISP to construct and operate its facility as proposed in its license application, as amended, and to receive, possess, store, and transfer spent nuclear fuel, including a small quantity of mixed-oxide fuel, and Greater-than-Class-C radioactive waste at the WCS CISF. The license authorizes ISP to store up to 5,000 metric tons of uranium [5,500 short tons] of spent nuclear fuel for a license period of 40 years. ISP will be required to operate under the conditions listed in Materials License No. SNM-2515.

The NRC staff's ROD that supports the NRC's decision to approve ISP's license application for the WCS CISF and to issue Materials License No. SNM-2515 is available in ADAMS under Accession No. ML21222A214. The ROD satisfies the regulatory requirement in section

51.102 paragraph (a) of title 10 of the *Code of Federal Regulations* (10 CFR), which requires that a Commission decision on any action for which a final environmental impact statement (EIS) has been prepared be accompanied by or include a concise public ROD. As discussed in the ROD and the final EIS for ISP's license application for a CISF for spent nuclear fuel in Andrews County, Texas (ADAMS Accession No. ML21209A955), the NRC staff considered a range of reasonable alternatives that included the No-Action alternative, as required by the National Environmental Policy Act of 1969, as amended; storage at a government-owned CISF; alternative design and storage technologies; and alternative locations. The final EIS documents the environmental review, including the NRC staff's recommendation to issue an NRC license to ISP to construct and operate a CISF for spent nuclear fuel at the proposed location, subject to the determinations in the NRC staff's safety review of the application. The final EIS conclusion is based on the NRC staff's independent environmental review, as well as (i) the license application, which includes the environmental report and supplemental documents and ISP's responses to the NRC staff's requests for additional information; (ii) consultation with Federal, State, Tribal, and local agencies and input from other stakeholders, including members of the public; and (iii) the assessments provided in the final EIS.

The NRC staff prepared a final safety evaluation report that documents the staff's safety and security review of the application (ADAMS Accession No. ML21188A101). The staff's safety and security review found that the application met applicable NRC regulations in 10 CFR part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste."

Documents related to the application carry Docket ID NRC-2016-0231. These documents for the ISP license include the license application, the applicant's safety analysis report, emergency plan, physical security plan, environmental report, updates to these documents, and applicant supplements and responses to NRC staff requests for additional information, and the NRC staff's final

safety evaluation report, final EIS, and ROD.

ISP's request for a materials license was previously noticed in the **Federal Register** on November 14, 2016 (81 FR 79531). A notice of docketing with an opportunity to request a hearing and to petition for leave to intervene was published in the **Federal Register** on January 30, 2017 (82 FR 8773). Four groups of petitioners filed petitions to intervene. An Atomic Safety and Licensing Board considered petitions and admitted one contention. The Board subsequently dismissed the contention as moot after ISP supplemented its application with information that the contention had noted was missing, and the Board subsequently terminated the adjudicatory proceeding. Intervenor's appealed the decisions to the Commission, and the Commission affirmed the Board decisions, with one new contention remanded to the Board for consideration. The Board subsequently dismissed the remanded contention, and the Commission denied an appeal of the Board decision.

In issuing a materials license to ISP for the WCS CISF, the NRC has determined based on its review of this application that there is reasonable assurance that: (i) The activities authorized by the license can be conducted without endangering the health and safety of the public; and (ii) these activities will be conducted in compliance with the applicable regulations of 10 CFR part 72. The NRC has further determined that the issuance of the license will not be inimical to the common defense and security.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," the details with respect to this action, including the final safety evaluation report and accompanying documentation and license, are available electronically in the ADAMS Public Documents collection at <https://www.nrc.gov/reading-rm/adams.html>. From this site, you can access ADAMS, which provides text and image files of the NRC public documents.

**II. Availability of Documents**

The documents identified in the following table are available to interested persons through one or more of the following methods, as indicated.

Document	ADAMS accession No.
1. Initial application, safety analysis report (SAR) and environmental report (ER), dated April 28, 2016 .....	ML16133A070 (Package).
2. Application Revision 1, SAR Revision 1, and ER Revision 1, dated March 16, 2017 .....	ML17082A021 (Package).
3. Application Revision 2, SAR Revision 2, and ER Revision 2, dated July 19, 2018 .....	ML18206A595 (Package).
4. ER Revision 3, dated February 17, 2020 .....	ML20052E144 (Package).

51928

Federal Register / Vol. 86, No. 178 / Friday, September 17, 2021 / Notices

Document	ADAMS accession No.
5. SAR Revision 3, dated May 22, 2020 .....	ML20150A337 (Package).
6. Application Revision 3, dated August 24, 2020 .....	ML20237F470.
7. SAR Revision 4, September 2, 2020 .....	ML20261H419 (Package).
8. Application Revision 4 and SAR Revision 5, dated April 12, 2021 .....	ML21105A766 (Package).
9. Applicant response to request for additional information, dated July 19, 2018 .....	ML18208A437.
10. Applicant response to request for additional information, dated January 7, 2019 .....	ML19009A099.
11. Applicant response to request for additional information, dated March 22, 2019 .....	ML19085A055.
12. Applicant response to request for additional information, dated May 31, 2019 .....	ML19156A048 (Package).
13. Applicant response to request for additional information, dated June 26, 2019 .....	ML19197A044.
14. Applicant response to request for additional information, dated June 28, 2019 .....	ML19184A159 (Package).
15. Applicant response to request for additional information, dated June 28, 2019 .....	ML19190A227 (Package).
16. Applicant response to request for additional information, dated July 31, 2019 .....	ML19217A231 (Package).
17. Applicant response to request for additional information, dated August 20, 2019 .....	ML19235A157 (Package).
18. Applicant response to request for additional information, dated September 18, 2019 .....	ML19270E399.
19. Applicant submittal of supplemental information, dated September 20, 2019 .....	ML19268A113 (Package).
20. Applicant response to request for additional information, dated November 21, 2019 .....	ML19337B502 (Package).
21. Applicant response to request for additional information, dated January 6, 2020 .....	ML20015A448 (Package).
22. Applicant response to request for additional information, dated January 17, 2020 .....	ML20028E843 (Package).
23. Applicant response to request for additional information, dated January 22, 2020 .....	ML20028D890 (Package).
24. Applicant response to request for additional information, dated February 14, 2020 .....	ML20052D995 (Package).
25. Applicant response to request for additional information, dated February 14, 2020 .....	ML20052E047 (Package).
26. Applicant submittal of supplemental information, dated March 5, 2020 .....	ML20071F152 (Package).
27. Applicant response to request for additional information, dated March 16, 2020 .....	ML20083J964 (Package).
28. Applicant response to request for additional information, dated April 7, 2020 .....	ML20105A133 (Package).
29. Applicant response to request for additional information, dated April 7, 2020 .....	ML20105A171 (Package).
30. Applicant response to request for additional information, dated May 18, 2020 .....	ML20139A173 (Package).
31. Applicant response to request for additional information, dated June 11, 2020 .....	ML20163A008.
32. Applicant submittal of supplemental information, dated July 21, 2020 .....	ML20203M040.
33. Applicant submittal of supplemental information, dated January 27, 2021 .....	ML21027A147.
34. Draft Environmental Impact Statement, dated May 2020 .....	ML20122A220.
35. Overview of the Draft Environmental Impact Statement, dated May 2020 .....	ML20121A016.
36. Overview of the Draft Environmental Impact Statement (Spanish language version), dated May 2020 .....	ML20136A148.
37. Final Environmental Impact Statement, dated July 2021 .....	ML21209A955.
38. Overview of the Final Environmental Impact Statement, dated July 2021 .....	ML21200A050.
39. Final Safety Evaluation Report, dated September 2021 .....	ML21188A101.
40. NRC Staff's Record of Decision, dated September 13, 2021 .....	ML21222A214.
41. Materials License for ISP, dated September 13, 2021 .....	ML21188A096 (Package).

Dated: September 13, 2021.

For the Nuclear Regulatory Commission.

Shana R. Helton,

Director, Division of Fuel Management, Office of Nuclear Material Safety and Safeguards.

[FR Doc. 2021-20092 Filed 9-16-21; 8:45 am]

BILLING CODE 7590-01-P

## POSTAL REGULATORY COMMISSION

[Docket Nos. CP2020-171; CP2020-172; CP2020-179; CP2020-182; CP2020-196]

### New Postal Product

AGENCY: Postal Regulatory Commission.

ACTION: Notice.

**SUMMARY:** The Commission is noticing a recent Postal Service filing for the Commission's consideration concerning a negotiated service agreement. This notice informs the public of the filing, invites public comment, and takes other administrative steps.

**DATES:** Comments are due: September 21, 2021.

**ADDRESSES:** Submit comments electronically via the Commission's Filing Online system at <http://www.prc.gov>.

Those who cannot submit comments electronically should contact the person identified in the **FOR FURTHER INFORMATION CONTACT** section by telephone for advice on filing alternatives.

**FOR FURTHER INFORMATION CONTACT:** David A. Trissell, General Counsel, at 202-789-6820.

### SUPPLEMENTARY INFORMATION:

#### Table of Contents

- I. Introduction
- II. Docketed Proceeding(s)

#### I. Introduction

The Commission gives notice that the Postal Service filed request(s) for the Commission to consider matters related to negotiated service agreement(s). The request(s) may propose the addition or removal of a negotiated service agreement from the market dominant or the competitive product list, or the modification of an existing product currently appearing on the market dominant or the competitive product list.

Section II identifies the docket number(s) associated with each Postal

Service request, the title of each Postal Service request, the request's acceptance date, and the authority cited by the Postal Service for each request. For each request, the Commission appoints an officer of the Commission to represent the interests of the general public in the proceeding, pursuant to 39 U.S.C. 505 (Public Representative). Section II also establishes comment deadline(s) pertaining to each request.

The public portions of the Postal Service's request(s) can be accessed via the Commission's website (<http://www.prc.gov>). Non-public portions of the Postal Service's request(s), if any, can be accessed through compliance with the requirements of 39 CFR 3011.301.<sup>1</sup>

The Commission invites comments on whether the Postal Service's request(s) in the captioned docket(s) are consistent with the policies of title 39. For request(s) that the Postal Service states concern market dominant product(s), applicable statutory and regulatory

<sup>1</sup> See Docket No. RM2018-3, Order Adopting Final Rules Relating to Non-Public Information, June 27, 2018, Attachment A at 19-22 (Order No. 4679).

**CERTIFICATE OF SERVICE**

I, Diane Curran, hereby certify that on November 4, 2021, I posted Petitioner's Amended Petition for Review on the Court's ECF website. I also sent copies of those documents to the following by first-class mail:

Merrick B. Garland, Atty. Genl. (by registered mail, return receipt requested)  
United States Department of Justice  
Environment and Natural Resources Division  
950 Pennsylvania Avenue N.W.  
Washington, D.C. 20530-0001

Marian Zobler, General Counsel  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Annette L. Vietti-Cook, Secretary (by registered mail, return receipt requested)  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16G4  
Washington, D.C. 20555-0001

Paul Bessette, Esq.  
Ryan Lighty, Esq.  
Timothy Matthews, Esq.  
Morgan, Lewis and Bockius, L.L.P  
1111 Pennsylvania Ave. N.W.  
Washington, D.C. 20004

Terry J. Lodge, Esq.  
316 N. Michigan Street, Suite 520  
Toledo, OH 43604-5627

Wallace L. Taylor, Esq.  
4403 1<sup>st</sup> Avenue, Suite 402  
Cedar Rapids, IA 52404



Monica R. Perales, Esq.  
6101 Holiday Hill Road  
Midland, TX 79707

Allan Kanner, Esq.  
Annemieke M. Tennis, Esq.  
Kanner & Whiteley, LLC  
701 Camp Street  
New Orleans, LA 70130

Karen D. Hadden, Executive Director,  
Sustainable Energy and Economic Development (SEED) Coalition  
605 Carismatic Lane  
Austin, TX 78748

Diane D'Arrigo  
Nuclear Information and Resource Service (NIRS)  
6930 Carroll Avenue  
Suite 340  
Takoma Park, MD 20912

Chris Hebner, Esq.  
City of San Antonio, TX  
P.O. Box 839966  
San Antonio, TX 78283

Respectfully Submitted,

           /signed electronically by/           

Diane Curran  
Harmon, Curran, Spielberg, & Eisenberg, L.L.P.  
1725 DeSales Street N.W., Suite 500  
Washington, D.C. 20036  
240-393-9285  
Email: [dcurran@harmoncurran.com](mailto:dcurran@harmoncurran.com)