



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713**

March 2, 2022

EA-21-045

Nicole Kennedy  
Steel City Gamma, LLC  
309 Woodland Rd  
Daisytown, PA 15427

**SUBJECT: STEEL CITY GAMMA, LLC - NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY - \$ 25,600, NRC INVESTIGATION REPORT NO. 1-2020-008**

Dear Ms. Kennedy:

This letter refers to an investigation conducted by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) between April 21, 2020, and March 1, 2021, to determine whether Steel City Gamma, LLC (SCG) deliberately conducted unauthorized and/or unlicensed radiography activities within NRC jurisdiction. In a letter dated December 2, 2021 (ML21278A008<sup>1</sup>), the NRC summarized the findings of the investigation and informed you that the NRC identified two apparent willful violations which were being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. In the letter, the NRC offered you the opportunity to attend a predecisional enforcement conference (PEC).

On February 3, 2022, the NRC conducted a PEC with you and the former owner of SCG by telephone to discuss the apparent willful violations, their significance, their root causes, and your corrective actions. The conference was closed to public observation because we discussed the findings of an OI report that has not been publicly disclosed. During the conference you acknowledged the violations and stated that you would no longer conduct industrial radiography and intended to withdraw your application for an NRC license for your other company, A & B Testing.

Based on the information developed during the investigation and the information that you provided during the conference, the NRC has determined that two violations of NRC requirements occurred and is proceeding with enforcement action. Additionally, the NRC found sufficient evidence to conclude that the actions of the former owner of SCG in relation to these violations were willful (deliberate misconduct). These violations are cited in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) and the circumstances surrounding them are described in detail in the subject investigation report.

The first violation involved SCG's failure to file for reciprocity prior to performing work in NRC jurisdiction as required by 10 CFR 150.20. Specifically, on December 18, 2019, and between January 1, 2020, and March 9, 2020, SCG performed industrial radiography work at a facility in Pleasant Valley, West Virginia, a non-Agreement State, without filing for reciprocity prior to performing work. The second violation involved SCG performing licensed activities in NRC

---

<sup>1</sup> Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Unless otherwise noted, documents referenced in this letter are publicly available using the accession number in ADAMS.

jurisdiction without a license, contrary to 10 CFR 30.3(a). Specifically, after SCG's Pennsylvania license was modified to possession and storage only on March 10, 2020, SCG performed industrial radiography at the same facility in West Virginia between March 10 and April 9, 2020, without holding a specific or general NRC license authorizing such activities. The NRC considers these violations to be significant because SCG's failure to file for reciprocity, and SCG's performance of activities in NRC jurisdiction without having the required specific or general NRC license, impacted the NRC's ability to inspect SCG's activities to ensure the adequate protection of public health and the safe use of radioactive materials. Because the violations are related, they have been categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level (SL) II problem.

In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$25,600 is considered for a SL II problem. Absent Corrective Action credit, a civil penalty at two times the base civil penalty in the amount of \$51,200 would have been considered for this SL II problem. Because SCG has not previously been the subject of escalated enforcement action and both violations were determined to be willful, the NRC considered whether credit was warranted for Identification and Corrective Action in accordance with the civil penalty assessment process in Section 2.3.4 of the NRC Enforcement Policy. The NRC determined that Identification credit was not warranted because the violations were not identified by SCG. However, the NRC concluded that Corrective Action credit was warranted for SCG's actions taken to address the violations. Specifically, SCG ceased all industrial radiography and has transferred its radioactive material to the Commonwealth of Pennsylvania, and you have withdrawn the NRC license application you submitted for A & B Testing.

Therefore, to emphasize the importance of compliance with NRC regulatory requirements, I have been authorized, after consultation with the Director, Office of Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the base amount of \$25,600 for the SL II problem.

You may choose to pay the proposed civil penalty, or the cumulative amount of the civil penalties if more than one civil penalty is proposed, by submitting your payment, with the invoice enclosed to this letter, to the following address:

Office of the Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
P.O. Box 979051  
St. Louis, MO 63197

In addition, you may pay the proposed civil penalty in accordance with NUREG/BR-0254. When using NUREG/BR-0254 to pay the civil penalty, the invoice number (EA-21-045) should be used as the "enforcement action identifier" when submitting your payment through one of the approved methods listed in the brochure. The NRC may consider a request for additional time to pay the proposed civil penalty, including the option to enter into an installment agreement, if payment of the civil penalty as a lump sum in the required timeframe would pose a financial hardship. To request additional time to pay, you must submit a written request, with appropriate justification explaining your financial hardship, to [NRCCollections.Resource@nrc.gov](mailto:NRCCollections.Resource@nrc.gov). All requests should be submitted in sufficient time to allow the NRC the ability to review your request for additional time to pay before the 30-day payment period expires.

The NRC recognizes that many of its licensees have been adversely impacted financially by the public health emergency caused by the Coronavirus Disease 2019 (COVID-19). Consequently,

as described in the enclosed Notice, the NRC is extending by 30 days the period of time by which the civil penalty must be paid (i.e., extending the deadline from 30 days to 60 days from the date of this Notice), and the NRC would consider a request for additional time, if appropriate. Please refer to the enclosed Notice for further instructions

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response, if you are required to provide one, will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. The NRC also includes significant enforcement actions on its Web site at [http://www.nrc.gov/reading\\_rm/doc\\_collections/enforcement/actions/](http://www.nrc.gov/reading_rm/doc_collections/enforcement/actions/).

If you have any questions concerning this matter, please contact Christopher Cahill of my staff at 610-337-5108 or [Christopher.Cahill@nrc.gov](mailto:Christopher.Cahill@nrc.gov).

Sincerely,

David C. Lew  
Regional Administrator

Enclosures:

1. Notice of Violation and Proposed Imposition of Civil Penalty
2. Civil Penalty Invoice No. (EA-21-045)
3. NUREG/BR-0254 Payment Methods (Licensee only)

cc w/enclosures  
Commonwealth of Pennsylvania

**SUBJECT: STEEL CITY GAMMA, LLC - NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY- \$ 25,600, NRC INVESTIGATION REPORT NO. 1-2020-008, Dated March 2, 2022**

**DISTRIBUTION w/enc1:**

|   |                     |
|---|---------------------|
| SECY  | RIDSSECYMAILCENTER  |
| OEMAIL                                      |                     |
| OEWEB                                       |                     |
| D Dorman, EDO                               | RIDSEDOMAILCENTER   |
| C Haney, DEDM                               |                     |
| S Dennis, OEDO                              |                     |
| M Lombard, OE                               | RIDSOEMAILCENTER    |
| T Martinez-Navedo, OE                       |                     |
| J Peralta, OE                               |                     |
| N Hasan, OE                                 |                     |
| L Sreenivas, OE                             |                     |
| J Lubinski, NMSS                            | RIDSNMSSOD RESOURCE |
| R Lewis, NMSS                               |                     |
| K Williams, NMSS                            |                     |
| M Burgess, NMSS                             |                     |
| Enforcement Coordinators                    |                     |
| RII, RIII, RIV (M Kowal; S Lewman; J Groom) |                     |
| M Lemoncelli, OGC                           | RIDSOGCMAILCENTER   |
| P Moulding, OGC                             |                     |
| M Simon, OGC                                |                     |
| H Harrington, OPA                           | RIDSOPAMAILCENTER   |
| R Feitel, OIG                               | RIDSOIGMAILCENTER   |
| T Higgs, OI                                 | RIDSOIMAILCENTER    |
| D D'Abate, OCFO                             | RIDSOCFOMAILCENTER  |
| B Welling, DRSS, RI                         | R1DRSSMAILRESOURCE  |
| T Bloomer, DRSS, RI                         |                     |
| C Cahill, DRSS, RI                          |                     |
| S Courtmanche, DRSS, RI                     |                     |
| M Reichard, DRSS, RI                        |                     |
| R Ragland, DRSS, RI                         |                     |
| D Screnci, PAO-RI / N Sheehan, PAO-RI       |                     |
| M Ford, SAO-RI / F Gaskins, SAO-RI          |                     |
| B Klukan, ORA, RI                           |                     |
| R McKinley, ORA, RI                         |                     |
| D Garvin, ORA, RI                           |                     |

**ML22041A233**

DOCUMENT NAME: [https://usnrc-my.sharepoint.com/personal/cxs5\\_nrc\\_gov/Documents/Desktop/Steel City Gamma/Steel City Gamma NOV II with CP.docx](https://usnrc-my.sharepoint.com/personal/cxs5_nrc_gov/Documents/Desktop/Steel%20City%20Gamma/Steel%20City%20Gamma%20NOV%20II%20with%20CP.docx)

| X SUNSI Review/ CJC |               | X Non-Sensitive<br>□ Sensitive |                        |                          | X Publicly Available<br>□ Non-Publicly Available |                     |
|---------------------|---------------|--------------------------------|------------------------|--------------------------|--|---------------------|
| OFFICE              | RI/ORA        | RI/DRSS                        | RI/DRSS                | RI/ORA                   | RI/ORA   | NMSS                |
|                     | C Crisden/CJC | C Cahill/CC via email          | T Bloomer/TB via email | R McKinley/RRM via email | B Klukan/ NLO via email                          | M Burgess           |
| DATE                | 2/15/22       | 2/16/22                        | 2/16/22                | 2/16/22                  | 2/16/22  | 2/23/22             |
| OFFICE              | OGC           | OE                             |                        |                          | RI/DRSS  | DRA                 |
|                     | M Simon (NLO) | J Peralta                      |                        |                          | T Bloomer/TB via email                           | D Lew/DCL via email |
| DATE                | 2/24/22       | 2/25/22                        |                        |                          | 2/28/22  | 3/1/22              |

OFFICIAL RECORD COPY

## ENCLOSURE 1

### NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY

Steel City Gamma  
Daisytown, Pennsylvania

EA-21-045

During an NRC investigation conducted between April 20, 2020, and March 1, 2021, violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

- A. 10 CFR 150.20(a)(1) states, in part, that any person who holds a specific license from an Agreement State is granted a general license to conduct the same activity in non-Agreement States subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in non-Agreement States shall, at least 3 days before engaging in each activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, on December 18, 2019, and from January 1, 2020 through March 9, 2020, Steel City Gamma, LLC, an Agreement State licensee, engaged in licensed activities in a non-Agreement State without meeting the requirements in 10 CFR 150.20(b)(1). Specifically, Steel City Gamma, LLC, engaged in industrial radiography at a facility in Pleasant Valley, West Virginia, a non-Agreement State, without first submitting an NRC Form 241, a copy of its Agreement State license, and the appropriate fee to the Regional Office.

- B. 10 CFR 30.3(a) states that except for persons exempt as provided in 10 C.F.R. Parts 30 and 150, no person shall possess or use byproduct material except as authorized in a specific or general license issued in accordance with NRC regulations.

Contrary to the above, on numerous occasions from March 10, 2020, through April 9, 2020, Steel City Gamma, LLC, used byproduct material in NRC jurisdiction without a specific or general license issued by the NRC. Specifically, Steel City Gamma, LLC engaged in industrial radiography in West Virginia, a non-Agreement State, without holding a specific NRC license authorizing such activities, and after its Pennsylvania license was modified to possession and storage only, which precluded SCG from meeting the conditions for a general NRC license under 10 CFR 150.20(a)(1).

These two violations are categorized as a Severity Level II problem (Enforcement Policy Sections 6.3 and 6.9)

Civil Penalty - \$25,600

Pursuant to the provisions of 10 CFR 2.201, Steel City Gamma, LLC is hereby required to submit a written statement or explanation to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, with a copy to the Document Control Desk, Washington, DC 20555-0001, within 30 days of the date of this Notice of Violation and Proposed Imposition of Civil Penalty (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation and Proposed Imposition of Civil Penalty; (EA-21-045)" and should include for each alleged violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, the NRC may issue an order or a Demand for Information requiring you to explain why the NRC should not take other action as may be proper. Consideration may be given to extending the response time for good cause shown.

Steel City Gamma, LLC may pay the civil penalty proposed above or the cumulative amount of the civil penalties if more than one civil penalty is proposed, through one of the following two methods:

1. Submit the payment with the enclosed invoice for Civil Penalty EA-21-045, issued to Steel City Gamma, LLC, to the following address:

Office of the Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
P.O. Box 979051  
St. Louis, MO 63197

OR

2. Submit the payment in accordance with NUREG/BR-0254.

Submit to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, a statement indicating when and by what method payment was made. In recognition of the financial impact to licensees by the public health emergency caused by the Coronavirus Disease 2019 (COVID-19), the NRC is extending the period of time by which the civil penalty must be paid from 30 days to 60 days from the date of this Notice. Should you fail to pay the civil penalty within 60 days of the date of this Notice, the NRC may issue an order imposing the civil penalty.

Separately, you may request an additional extension of time to pay the civil penalty as a result of impacts from COVID-19. Such an extension request must be in writing, should explain the basis for the request, and should specify the amount of additional time being requested. This extension request must be submitted to the NRC no later than 50 days from the date of this Notice (i.e., at least 10 days before the initial 60-day deadline to pay the civil penalty).

Steel City Gamma, LLC may protest the imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should the Steel City Gamma, LLC fail to answer within 30 days of the date of this Notice, the NRC will issue an order imposing the civil penalty. Should Steel City Gamma, LLC elect to file an answer in accordance with 10 CFR

2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation (EA-21-045)" and may: (1) deny the violation(s) listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the response should address the factors addressed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or explanation provided pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of Steel City Gamma, LLC is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., Reply to Notice of Violation, Statement as to payment of civil penalty, Extension request to the CP payment, and Answer to a Notice of Violation, should be addressed to: Mark Lombard, OE, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region I and the Document Control Center, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

To the extent possible, your response should not include any personal privacy, proprietary, classified or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 2<sup>nd</sup> day of March 2022



03/02/2022

**Address/Customer Information**

Steel City Gamma, LLC  
309 Woodland Road  
Daisytown, PA 15427

**Customer Codes**

Account Code: L000002976/1

**Bill Information**

Bill Number: EA-21-045  
Amount Due: \$25,600.00  
Due Date: 04/01/2022

**Contact Us**

Phone Number: 301-415-7554  
Fax Number: 301-415-4135  
Email Address: Fees.Resource@nrc.gov

**Remit to Address**

Office of the Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
P.O. Box 979051  
St. Louis, MO 63197

**Bill Summary**

|                   |                    |
|-------------------|--------------------|
| Initial Charges   | \$25,600.00        |
| Discount          | 0.00               |
| Surcharge         | 0.00               |
| Interest Charges  | 0.00               |
| Penalty Charges   | 0.00               |
| Admin Charges     | 0.00               |
| Bill Amount       | \$25,600.00        |
| Collected         | 0.00               |
| Applied Credit    | 0.00               |
| Adjustments       | 0.00               |
| <b>Amount Due</b> | <b>\$25,600.00</b> |

**Credit Summary**

|                     |               |
|---------------------|---------------|
| Applied Credit      | \$0.00        |
| Unapplied Credit    | 0.00          |
| <b>Credit Total</b> | <b>\$0.00</b> |

**Comments:**

For questions, contact (301) 415-7554 or by email at Fees.Resource@nrc.gov. For NRC debt collection procedures, including interest and penalty provisions, see 31 U.S.C. 3717, 4 CFR 101-105, AND 10 CFR 15.

If this invoice is related to an Order Imposing a Civil Penalty, Steel City Gamma, LLC is required to pay the Civil Penalty within 30 days of the Order date. If payment is in response to a Notice of Violation and Proposed Imposition of a Civil Penalty, please follow the instructions in the Notice. The NRC may consider a request for additional time to pay the Civil Penalty, including the option to enter into an installment agreement, if appropriate. All requests for additional time to pay an invoice must be submitted in writing, with appropriate justification, to NRCCollections.Resource@nrc.gov, and should be submitted sufficiently ahead of time to allow the NRC time to review the request for additional time to pay within the 30-day payment period. This Invoice is related to the Civil Penalty proposed or imposed under EA-21-045 issued to Steel City Gamma, LLC. Please include this reference number on your payment method (see attached Payments Methods Brochure).



**Customer Information**

L000002976/1  
Steel City Gamma, LLC  
309 Woodland Road  
Daisytown, PA 15427

**Change of Address:**

---

---

---

---

---

**Phone:**

---

**Remittance Information**

Office of the Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
P.O. Box 979051  
St. Louis, MO 63197

**This Payment References the following Bill:**

EA-21-045

**Outstanding Amount Due:**

\$25,600.00

**Amount Enclosed:**

---

## QUESTIONS?

If you have questions, please visit <https://www.nrc.gov> and search for "License Fees."

Questions may also be directed to the NRC Accounts Receivable Help Desk by e-mail at [nrc@fiscal.treasury.gov](mailto:nrc@fiscal.treasury.gov), by phone at (301) 415-7554, or by writing to the address below:

U.S. NUCLEAR REGULATORY COMMISSION  
OCFO/DOC/ARB  
Mail Stop T9-E10  
Washington, DC 20555-0001



# Payment Methods

U.S. NUCLEAR REGULATORY COMMISSION  
OCFO/DOC/ARB  
Mail Stop T-9-E10  
Washington, DC 20555-0001  
PH (301) 415-7554



NUREG/BR-0254, Rev. 9  
June 2019



@NRCgov

Estimated burden per response to comply with this voluntary collection request: 10 minutes. This brochure provides information about available payment methods. Forward comments about to burden estimate to the Records Management Branch (T6-F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0190), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

NRC accepts the methods described below.

## PAYMENT BY AUTOMATED CLEARINGHOUSE

To pay by Automated Clearinghouse/Electronic Data Interchange (ACH/EDI), provide a copy of NRC Form 628 to your financial institution. You may obtain a copy of NRC Form 628 from the NRC Web site at <http://www.nrc.gov> by searching for "NRC Form 628." You can also obtain a form by calling the NRC Accounts Receivable Help Desk at (301) 415-7554.

## PAYMENT BY CREDIT CARD

The NRC is currently accepts credit card payments of up to \$24,999.99. For payment by credit card, go to Pay.gov, search for "U.S. Nuclear Regulatory Commission Fees" and enter the required information.

You may also mail or fax NRC Form 629 following the directions on the form. To obtain a copy of NRC Form 629 go to <http://www.nrc.gov> and search for "NRC Form 629" or call the NRC Accounts Receivable Help Desk at (301) 415-7554.



## PAYMENT BY FEDWIRE DEPOSIT SYSTEM

The NRC can receive funds through the U.S. Department of the Treasury (Treasury) Fedwire Deposit System. The basic wire message format below complies with the Federal Reserve Board's standard structured third-party format for all electronic funds transfer (EFT) messages.

See the sample EFT message to Treasury below. Each numbered field is described below.

The diagram shows an EFT message structure with the following fields and their corresponding numbers:

- 1: TO (021030004)
- 2: FROM (021030004)
- 3: ORDERING BANK AND RELATED DATA
- 4: REF (16-character reference number)
- 5: AMOUNT
- 6: ORDERING BANK AND RELATED DATA
- 7: TREAS NYC/CTR
- 8: BNF-/AC-31000001 OBI-
- 9: BNF-/AC-31000001
- 10: OBI-

**1 RECEIVER-DFI#** – Treasury's ABA number for deposit messages is 021030004.

**2 TYPE-SUBTYPE-CD** – The sending bank will provide the type and subtype code.

**3 SENDER-DFI#** – The sending bank will provide this number.

**4 SENDER-REF#** – The sending bank will insert this 16-character reference number at its discretion.

**5 AMOUNT** – The transfer amount must be punctuated with commas and decimal point; use of the "\$" is optional. The depositor will provide this item.

**6 SENDER-DFI-NAME** – The Federal Reserve Bank will automatically insert this information.

**7 RECEIVER-DFI-NAME** – Treasury's name for deposit messages is "TREAS NYC". The sending bank will enter this name.

**8 PRODUCT CODE** – A product code of "CTR" for customer transfer should be the first item in the receiver text field. Other values may be entered, if appropriate, using the ABA's options. A slash must be entered after the product code.

**9 AGENCY LOCATION CODE (ALC)** – THIS ITEM IS OF CRITICAL IMPORTANCE. IT MUST APPEAR ON THE FUNDS TRANSFER DEPOSIT MESSAGE IN THE PRECISE MANNER AS STATED TO ALLOW FOR THE AUTOMATED PROCESSING AND CLASSIFICATION OF THE FUNDS TRANSFER MESSAGE TO THE AGENCY LOCATION CODE OF THE APPROPRIATE AGENCY. The ALC identification sequence can, if necessary, begin on one line and end on the next line; however, the field tag "BNF=" must be on one line and cannot contain any spaces. The NRC's 8-digit ALC is: BNF=/AC-31000001

**10 THIRD-PARTY INFORMATION** – The Originator to Beneficiary Information (OBI) field tag "OBI=" signifies the beginning of the free-form third-party text. All other identifying information intended to enable the NRC to identify the deposit—for example, NRC annual fee invoice number, description of fee, 10 CFR 171 annual fee, and licensee name—should be placed in this field.

The optimum format for fields 7, 8, 9, and 10 using an 8-digit ALC is as follows:

TREAS NYC/CTR/BNF=/AC-31000001 OBI=

The optimum format, shown above, will allow 219 character positions of information following the "OBI=" indicator.

If the licensee's bank is not a member of the Federal Reserve System, the nonmember bank must transfer the necessary information and funds to a member bank, which then must transfer the information and funds to the local Federal Reserve Bank.

For a transfer of funds from local Federal Reserve Banks to be recorded on the same day, the transfer must be received at the New York Federal Reserve Bank by 4 p.m., EST. Otherwise, the deposit will be recorded on the next workday.

## PAYMENT BY CHECK

Checks should be made payable to the U.S. Nuclear Regulatory Commission with the invoice number, Enforcement Action number, or other information that identifies the payment, written on the check. Mail the check to the following address:

U.S. Nuclear Regulatory Commission  
U.S. Bank  
P.O. Box 979051  
St. Louis, MO 63197-9000

FedEx or overnight mailings must be delivered to the following address:

U.S. Nuclear Regulatory Commission  
U.S. Bank Government Lockbox  
SL-MO-C2GL  
1005 Convention Plaza  
St. Louis, MO 63101

## TAXPAYER IDENTIFICATION NUMBER

You must file your Taxpayer Identification Number (TIN) with the NRC. Use NRC Form 531 to provide your TIN. You may obtain NRC Form 531 from the NRC Web site at <http://www.nrc.gov> by searching for "NRC Form 531" or by calling the NRC Accounts Receivable Help Desk at (301) 415-7554.