

From: [Jervy, Richard](#)
To: [Mahood, Kevin Joseph](#)
Subject: RE: RE: RE: Electronic Copy of Signed Penn State 2021 Submission
Date: Monday, February 7, 2022 5:15:00 PM
Attachments: [image001.png](#)

Hi Kevin,

Sorry to be so long to respond. I prepared a copy of the Deloitte AUP report and removed the paragraph regarding off balance sheet exposure. Otherwise, planning on the rest of the package to be public.

Thanks

Rick Jervy

From: Mahood, Kevin Joseph <kjm5032@psu.edu>
Sent: Friday, January 14, 2022 11:17 AM
To: Jervy, Richard <Richard.Jervy@nrc.gov>
Subject: [External_Sender] RE: RE: Electronic Copy of Signed Penn State 2021 Submission

Rick,

Thanks for the explanation, this was very helpful. We have no objections to making public those items not noted in the affidavit. That being said, I want to make sure I understand exactly what will be redacted. Based on the affidavit, the off-balance sheet exposure amount within Deloitte's AUP report should be redacted. You had mentioned a table though, was this in reference to the decommissioning costs table in the self-guarantee agreement, or did you mean something different?

Thanks,
Kevin

From: Jervy, Richard <Richard.Jervy@nrc.gov>
Sent: Thursday, January 13, 2022 12:24 PM
To: Mahood, Kevin Joseph <kjm5032@psu.edu>
Subject: RE: RE: Electronic Copy of Signed Penn State 2021 Submission

Kevin,

Good question. Hopefully this response is not too much information.

What I have suggested is a method that many licensees use to simplify the process. Redacted copies done well eliminate a lot of second guessing and help preserve trust. There is an incentive with Commercial licensees to do that because we bill them for the time we take to review sensitive information. If the information ever gets requested under the freedom of information act, the interpretive work is already done.

You are fee exempt by law. But the Agency is 90% funded by licensee fees. My time spent in non-fee billable reviews is spread across the other licensee fees. It shifts the burden to them. Over the past several years, the fee bases have been scrutinized by licensee advocacy groups and from their supporters in congress. We have been required to spend the time necessary to account for our costs such that the level of understanding has improved and continues to be managed. It can seem pretty minor, but our billing rate is almost \$300/hr. So license reviews can be strikingly expensive at times.

We don't tell our licensees what to do. We suggest ways that are workable during our interfaces with them.

Our review is required to balance your interests, and the interests of the public. That is the reason for my request. It reduces the judgement and the process is expedient. I have found that early in the process of preparing documents is the right time to consider the sensitive nature of the information while you are preparing, and it clarifies the thought and reasoning that led to the judgement. Since we have already passed that point, and this exchange probably took more time than the entire exercise, either of us can easily do it.

I have not done the review yet, and the affidavit states with sufficient clarity what you are considering to be proprietary. That leaves the rest of the package as publicly available. If you have no objection, I will strike the table and publish the rest of the package.

I appreciate your consideration and understanding of my message.

Thank You

Rick Jervey
Licensing Project Manager

From: Mahood, Kevin Joseph <kjm5032@psu.edu>
Sent: Thursday, January 13, 2022 8:24 AM
To: Jervey, Richard <Richard.Jervey@nrc.gov>
Cc: Murawski, Jody L <gum8@psu.edu>; Guo, Yuanqing <yxg14@psu.edu>; Wilmot, Aaron D <adw154@psu.edu>
Subject: [External_Sender] RE: Electronic Copy of Signed Penn State 2021 Submission

Hi Rick,

Just to clarify, are you asking if we can provide a redacted version of the reporting package for the 2021 submission, or would this just be going forward? I haven't had this question come up before, so I just want to make sure I have the correct understanding.

Thanks,
Kevin

From: Jervey, Richard <Richard.Jervey@nrc.gov>
Sent: Monday, January 10, 2022 3:25 PM
To: Mahood, Kevin Joseph <kjm5032@psu.edu>
Cc: Murawski, Jody L <gum8@psu.edu>; Guo, Yuanqing <yxg14@psu.edu>; Wilmot, Aaron D <adw154@psu.edu>
Subject: RE: Electronic Copy of Signed Penn State 2021 Submission

Hi Kevin,

We have been reviewing your submittal and plan to provide a formal response following that review. Just for your information, the USPS copy was received and scanned into Agency Documentation Management System (ADAMS) for the record. The Agency's copy is identified by its ADAMS Accession number (ML21362A738) for common reference. The documents are withheld from the public at this time.

We review the proprietary request and then will release the public information following. In most cases if the most of information is publicly available, including a redacted public version is a time saving measure for our review. From your affidavit the redacted version would simply blank out the specific tables identified. Is that something you could consider providing?

Thanks

Rick Jervey

Penn State PM

From: Mahood, Kevin Joseph <kjm5032@psu.edu>
Sent: Friday, December 17, 2021 5:10 PM
To: Jervey, Richard <Richard.Jervey@nrc.gov>
Cc: Murawski, Jody L <gum8@psu.edu>; Guo, Yuanqing <yxg14@psu.edu>; Wilmot, Aaron D <adw154@psu.edu>
Subject: [External_Sender] Electronic Copy of Signed Penn State 2021 Submission

Good afternoon Rick,

Please see attached for an electronic copy of the Penn State 2021 annual certification and self-guarantee submission. The hard copy will be going out in the US mail in the next few days.

Thanks and happy holidays,
Kevin

Kevin J. Mahood, CPA
Manager of Financial Reporting



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