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CNRO-2022-00024

October 12, 2022

Chairman Christopher T. Hanson
Commissioner Jeff Baran
Commissioner David A. Wright
Commissioner Annie Caputo
Commissioner Bradley R. Crowell
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop O-16 B33
Washington, DC 20555-0001

Re: Request for NRC Disclosure of Non-Discrimination Investigation Reports to Licensees at the Pre-Decisional Stage of the Enforcement Process

Dear Commissioners:

Entergy Operations, Inc. ("Entergy") continues to be concerned about the lack of information available to licensees during the traditional enforcement process, and respectfully request that the Commission reconsider the NRC's current practice of not releasing investigation reports for non-discrimination cases to licensees at the pre-decisional stage of the enforcement process.

As you are aware, after the NRC conducts an investigation and completes its investigation report, the enforcement process includes a mechanism for engagement between the NRC and its licensees before the NRC issues a violation. The NRC first issues an apparent violation, then affords licensees an opportunity to provide their perspective on the matter for the NRC's consideration. The purpose of this engagement is to allow the NRC and the licensee to gain a common understanding of the underlying facts, which then allows the NRC to validate or adjust its initial enforcement determination prior to issuing an enforcement action. An important component of the NRC's process is this opportunity for the licensee to present its case as to why the matter does not constitute a violation, or why the matter should be categorized at a certain severity level or why enforcement discretion should be granted.

Under current processes, this engagement does not facilitate a common understanding of the facts. Licensees have access to only a brief summary of the NRC's basis for the apparent violation. They do not have the evidence or analysis underlying the basis for the NRC's determination, such as the relevant investigation report or interview transcripts. Without a doubt, this lack of transparency disadvantages licensees and frustrates the objectives of the NRC's process.

Providing licensees the NRC's investigation report at the pre-decisional stage of the enforcement process would rectify this imbalance, improve licensee understanding of issues,

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and yield more meaningful pre-decisional deliberations. The NRC would ensure a sufficient basis for the violation exists before issuing the enforcement action. Licensees and the NRC could not only more readily gain alignment on what happened and why, but could also focus on the important work of preventing recurrence.

Enhanced transparency would not undermine the NRC's investigation process or whistleblower program. The reasons offered for not producing these reports when the NRC last considered the question in SECY-05-0213 have not held in the years that followed. Moreover, for nearly two decades, the NRC has released its investigation reports (redacted to remove identifying information of the alerger and witnesses) to licensees involved in discrimination proceedings at the pre-decisional conference stage. The rationale and policy considerations underlying the NRC's practice with respect to discrimination matters apply equally to *non-discrimination* matters.

For the reasons given in the enclosed analysis, we respectfully request the NRC to reconsider releasing investigation reports for non-discrimination cases to licensees at the pre-decisional stage of the enforcement process.

Sincerely,



A. Christopher Bakken, III

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Cc: Marian Zobler, General Counsel, NRC
Tracy Higgs, Director, Office of Investigations, NRC
Mark Lombard, Director, Office of Enforcement, NRC
Scott Morris, Regional Administrator for Region IV, NRC

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Request for NRC Disclosure of Non-Discrimination Investigation Reports to Licensees at the Pre-Decisional Stage of the Enforcement Process

The NRC has a compelling interest in ensuring its enforcement actions are appropriately tailored to the facts at issue. Accordingly, the NRC affords its licensees an opportunity to provide information to the NRC upon receipt of an apparent violation for the NRC's consideration. The licensee may have the option, or be required, to respond to an apparent violation in writing or attend a Pre-decisional Enforcement Conference ("PEC") or Alternative Dispute Resolution ("ADR"). No matter the method, this is the licensee's best opportunity to provide its perspective on the underlying issue.¹ Yet licensees are not on equal footing with the NRC at this stage of the process. Licensees lack meaningful access to the evidence and analysis underpinning the NRC's proposed conclusions. In fact, licensees have no mechanism by which to obtain this information until well after the NRC issues a violation. This hampers the utility of these pre-decisional engagements and invites frustration on both sides.

Providing licensees with the NRC Office of Investigation's ("OI") investigation report in non-discrimination cases – and better yet, the evidence and interview transcripts as well – would rectify this imbalance and yield more meaningful pre-decisional deliberations. Licensees and the NRC would be more likely to see eye-to-eye on the relevant facts and cause and could focus instead on preventing recurrence and the adequacy of the licensee response.

Further, this enhanced transparency would not undermine the NRC's investigation process or whistleblower program. Indeed, the reasons offered for not producing these reports when the NRC last considered the question in 2005, have not held in the years that followed. As the following paragraphs demonstrate, the issue is worthy of reconsideration.

A. Under the NRC's Current Process, Licensees are Not on Equal Footing with the NRC at the Pre-Decisional Stage of the Enforcement Process, Limiting Meaningful Engagement Between Licensees and the NRC

When licensees respond to an apparent violation in writing or attend an ADR or PEC, often dozens of licensee personnel spend weeks preparing a presentation to the NRC that sets forth the licensee's position on the underlying issue. Licensees must exhibit a comprehensive understanding of the issue and its cause, and demonstrate that the corrective actions the licensee took were prompt and effective to prevent recurrence. The strength of the licensee's response influences the enforcement outcome. A licensee who fails to recognize certain factors may not receive enforcement discretion, whereas a licensee whose pre-decisional presentation and corrective actions demonstrate a thorough understanding of the issue and alignment with the NRC may see civil penalties waived and more significant enforcement actions mitigated.

¹ See Nuclear Regulatory Commission Enforcement Manual, rev. 11, 15 (Feb. 24, 2022) (available at ADAMS Accession No. ML22056A177) ("The purpose of the PEC is to obtain information that will assist the NRC in determining the appropriate enforcement action") ("Enforcement Manual"); see e.g., River Bend Station – NRC Inspection Report 05000458/2021090 and Investigation Reports 4-2020-008, 4-2020-009, and 4-2020-019 at 2 (July 1, 2021) (available at ADAMS Accession No. ML21182A222) (noting that a pre-decisional enforcement conference "will afford you the opportunity to provide your perspective on these matters and any other information that you believe the NRC should take into consideration before making an enforcement decision").

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For the most part, however, licensees prepare this response having access to only a very brief summary of the violation provided by the NRC.² That summary, usually a couple of paragraphs but generally no more than two pages, lacks the detail and supporting evidence available in the NRC's full, unredacted investigation report. Indeed, those investigation reports may be more than 100 pages long, with well over 1000 pages of supporting interview transcripts.³ Despite this extreme difference in available information, the NRC expects the licensee to have the same understanding of the issue that it has.

This disparity persists even if the licensee conducted its own investigation of the matter. In our experience, nearly all cases that end up in traditional enforcement the licensee first identified, investigated, and reported. This does not mean, however, the NRC's investigation will reach the same result. Irrespective of the licensee's investigative capabilities, the NRC has several advantages, including: subpoena power, sworn testimony, and time.⁴ Even considering both investigations have access to the same witnesses and documents, the licensee and NRC may reach different determinations. A subject who denies misconduct to its employer may confess it to a federal agent when under oath and facing the possibility of criminal prosecution.

Consider, by way of example, a case in which the licensee conducts an investigation and finds careless disregard, but the NRC finds deliberate misconduct. The licensee believes its issue is programmatic in nature, while the NRC believes it is the result of an intentional bad actor. The licensee does not know what evidence of intent the NRC obtained during its investigation. When it responds to the apparent violation the licensee can reiterate the basis for its conclusion, but in most cases the licensee will have already provided this information during the NRC's investigation. The licensee cannot engage in a meaningful way with the NRC at the pre-decisional stage if the NRC has additional evidence it has not disclosed. The licensee has no opportunity to identify any omissions or misunderstandings in the evidentiary record. It cannot see what gaps or differences may exist in the NRC's analysis. Thus, the licensee has two options: reiterate its own findings, or blindly accept the NRC's. If the licensee takes the latter course, the purpose of the pre-decisional meeting is not served. If it takes the former, both parties come away frustrated: the licensee, because it cannot meaningfully address the NRC's findings; and the NRC, because the licensee has not accepted its determination.

Licensees likewise are not on equal footing with the NRC at the time the agency issues the initial enforcement action. The licensee has no more information when it receives a Notice of Violation than it did at the pre-decisional stage, yet it must contest or respond to the violation within 30 days. Even with the additional time available under a 30-day extension, the licensee has no more insight into the NRC's reasoning.

² The NRC's practice is consistent with Commission guidance in the Enforcement Manual, which provides that licensees receive only a "factual summary" of the investigation findings at the pre-decisional stage. See Enforcement Manual at 333.

³ More often than not, the investigation reports and supporting transcripts we receive via Freedom of Information Act requests are of this size.

⁴ Historically, a target timeframe for completing an NRC's Office of Investigation case is twelve months or less. See, e.g., Office of Investigations Annual Report FY 2019, vol. 16, xi (Feb. 2020) (available at ADAMS Accession No. ML20054A170) ("Of the 76 closed investigations, OI closed 93 percent in 12 months or less, exceeding OI's performance measures for both reactor and materials investigations").

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B. Licensees Lack Access to Non-Discrimination Investigation Information

Even after the pre-decisional stage, the licensee continues to lack information because there is no process whereby the licensee receives a copy of the investigation report, and because requests submitted to the NRC under the Freedom of Information Act (“FOIA”) do not yield timely results.

A licensee who receives an apparent violation and submits a FOIA request for the underlying investigation report, as Entergy did most recently in 2019, will have that request denied because the enforcement action is still open.⁵

Yet when the NRC issues its Notice of Violation and the report becomes available for production, a licensee can still expect to wait nearly a year to receive it. Over the last four years, Entergy submitted five requests under FOIA for investigation reports, in addition to the pre-decisional request noted above. The NRC took an average of 341 days to produce investigation reports in response to these FOIA requests.⁶ The shortest turnaround time was 75 days.⁷ Two reports took more than a year, and one of those took nearly three years.⁸ Even the fastest of these productions would not put a report in the hands of a licensee in time to determine how to respond to a Notice of Violation.⁹

The licensee has another opportunity to challenge the NRC’s enforcement action: by requesting a hearing. During the hearing process, the licensee can receive the NRC’s investigative products through discovery. But hearings are a time- and resource-consuming

⁵ See Enforcement Manual at 272 (stating that investigation reports are not available to the licensee until after the enforcement action has been issued, except in discrimination cases); see also Response to Freedom of Information Act (FOIA) Request NRC-2019-000271 (Apr. 22, 2019) (denying Entergy’s FOIA request “since the enforcement proceedings to which the requested [report of investigation] and interview transcripts pertain remains in open status at this time, disclosure of the 102-page [report of investigation] or any of the interview transcripts (consisting of an estimated 1145 pages) would interfere with ongoing enforcement proceedings”).

⁶ See Freedom of Information Act Requests No. NRC-2019-000135, NRC-2019-000306, NRC-2019-000248, NRC-2021-000191, and NRC-2022-000012.

⁷ See Response to Freedom of Information Act (FOIA) Request NRC-2022-000012 (Jan. 5, 2022) (producing records in response to a request submitted 75 days earlier, on October 22, 2021); Response to Freedom of Information Act (FOIA) Request NRC-2019-000248 (June 12, 2019) (producing records in response to a request submitted 76 days earlier, on March 28, 2019); see also Response to Freedom of Information Act (FOIA) Request NRC-2019-000135 (Mar. 15, 2019) (producing records in response to a request submitted 106 days earlier, on November 29, 2018).

⁸ See Response to Freedom of Information Act (FOIA) Request NRC-2021-000191 (May 20, 2022) (producing records in partial response to a request submitted 318 days earlier, on July 6, 2021); Response to Freedom of Information Act (FOIA) Request NRC-2021-000191 (Aug. 17, 2022) (producing the remaining records in response to a request submitted 407 days earlier, on July 6, 2021); Response to Freedom of Information Act (FOIA) Request NRC-2019-000306 (Apr. 6, 2022) (producing records in response to a request submitted 1042 days earlier, on May 30, 2019).

⁹ What’s more, the report the licensee receives through the FOIA process sometimes is redacted so heavily that it has little value.

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process, for both the licensee *and* the NRC. Requiring licensees to take that extreme measure in order to obtain the NRC's rationale for an enforcement action is not efficient or reasonable.

It is reasonable, however, for the NRC to provide investigative reports to licensees at the initial enforcement action stage, and even the pre-decisional stage. As you know, the NRC already does this for discrimination cases.¹⁰ When it first adopted this approach, the NRC did so after considering feedback from the industry that "fundamental fairness and the need for transparency compel the release" of investigative reports at the pre-decisional stage.¹¹ The industry maintained then, as do we now, that withholding investigative reports does not serve "the long-standing, stated purpose of pre-decisional enforcement conferences, with respect to *all* potential violations, [] 'to obtain information' and to reach 'common understanding' of facts, root causes, corrective action, and the significance of issues."¹² The Commission considered the advantages and disadvantages of producing investigative reports and concluded it should release the reports at the pre-decisional stage in discrimination cases, for the purpose of increasing transparency and improving enforcement conference efficiency.¹³ Entergy respectfully submits that for the same reasons, the Commission should consider producing investigative reports at the pre-decisional stage in *all* cases, not just those involving discrimination.

C. Reasons Against Disclosure Have Proven Invalid, Over Time

Entergy previously raised this concern to the NRC.¹⁴ In 2005, Entergy asked the Commission to direct the NRC Staff to provide Entergy with a copy of an NRC investigation report prior to Entergy's participation in a related PEC.¹⁵ NRC Staff evaluated Entergy's request and the Commission agreed with the Staff's recommendation to continue to provide licensees with summaries, rather than investigation reports.¹⁶ At that time, only two years had passed since the

¹⁰ See Enforcement Manual at 292.

¹¹ See SECY-02-0166, Policy Options and Recommendations for Revising the NRC's Process for Handling Discrimination Issues, Attachment 1: Discrimination Task Group Report, 59 (Apr. 2002) (available at ADAMS Accession No. ML022120514) ("SECY-02-0166 DTG Report"); see also Staff Requirements Memorandum SECY-02-0166, Policy Options and Recommendations for Revising the NRC's Process for Handling Discrimination Issues (Mar. 26, 2003) (available at ADAMS Accession No. ML030850783) (approving the Discrimination Task Force's recommendation to produce investigative reports to participants in advance of a pre-decisional enforcement conference) ("SRM 02-0166").

¹² See SECY-02-0166 DTG Report at 59 (emphasis added).

¹³ See SRM 02-0166 at 2 (approving the DTG's recommendation to release discrimination reports); SECY-02-0166 DTG Report at 60-61 (weighing reasons for and against disclosure, and ultimately recommending disclosure to "increase transparency of the process" and "improve enforcement conference efficiency").

¹⁴ See Request for Reconsideration of the NRC Staff's Denial of Entergy Nuclear Operations, Inc's Request for a Copy of Office Investigations Report No. 1-2004-040 Prior to an April 8, 2005 Predecisional Enforcement Conference (Mar. 18, 2005) (available at ADAMS Accession No. ML050820287).

¹⁵ See, generally *id.*

¹⁶ See, generally, SECY-05-0213, Policy Options and Recommendations for the Release of Reports Prepared by the Office of Investigations (Nov. 17, 2005) (available at ADAMS Accession No. ML060050271) (recommending disclosure of summaries rather than investigation reports, identifying reasons including: the alerger or witnesses may be identified, factual summaries are

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NRC began releasing redacted investigation reports to participants of discrimination pre-decisional conferences. Even so, the Staff noted that in those two years it had seen “no adverse effects associated with releasing redacted [investigation] reports.”¹⁷ An additional seventeen years have now passed, and Entergy posits that there continue to be no adverse effects associated with those disclosures.

In its 2005 deliberation, NRC Staff offered four reasons in support of disclosing investigation reports: (i) releasing the investigation report serves the primary purpose of a PEC, which is to gain alignment on the facts of the apparent violation; (ii) releasing the investigation report may result in a “more fruitful exchange of information” between the licensee and NRC; (iii) releasing the investigation report at the pre-decisional stage is resource efficient, because the licensee will be less likely to request a hearing to challenge the NRC’s final determination; and (iv) the NRC already releases these reports, at the pre-decisional stage for discrimination cases and through the FOIA process for other cases.¹⁸

The Staff then offered eight reasons against disclosure, each of which, we maintain, is unfounded¹⁹:

1. *Allegers “may not be well served,” presumably by the possible disclosure of their identity to the licensee.*

In our experience, many (if not most) cases in traditional enforcement involve issues the licensee identified; in other words, there is no algeber or the algeber is known to the licensee because he or she first raised the issue internally.²⁰ For the remaining cases, the NRC can protect the algeber’s identity through appropriate redactions in the report.

2. *Third-party witnesses may be less likely to cooperate with the NRC if they believe their testimony will be shared with the licensee.*

First, as with the prior concern, most witnesses are already known to the licensee or their identity could be protected through redactions. Second, licensees ultimately can obtain the report via FOIA; obtaining it at an earlier stage in the process should have no impact on witnesses’ willingness to testify. Third, contrary to the NRC’s claim that “witnesses do not have anything to gain by

effective, reports would disclose the weaknesses in the NRC’s case, and without reports licensees are more likely to conduct a thorough investigation) (“SECY-05-0213”); Staff Requirements Memorandum SECY-05-0213, Policy Options and Recommendations for the Release of Reports Prepared by the Office of Investigations (Jan. 5, 2006) (available at ADAMS Accession No. ML060060088) (approving the Staff’s recommendation) (“SRM 05-0213”).

¹⁷ SECY-05-0213 at 7.

¹⁸ See *id.* at 5.

¹⁹ See *id.* at 6.

²⁰ For all of the reports that were the subject of Entergy’s recent FOIA requests, Entergy knew the identity of the algeber at the time of the enforcement action. In fact, in almost all of those cases, Entergy self-identified the issue.

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providing candid testimony to OI,” witnesses have nothing to gain (and much to lose) by refusing to cooperate with OI. Witnesses provide testimony under oath and can be compelled to testify. Finally, providing investigation reports to licensees as a matter of course may have a positive impact on witness participation in licensee investigations. If witnesses expect they will be required to provide sworn testimony to the NRC, and that testimony will be shared with the licensee, they may be more likely to be candid in licensee interviews.

3. *The summaries the NRC already provides with an apparent violation are “effective at providing an overview of OI’s investigation.”*

In our experience, they are not. Again, the one- or two-page summary necessarily lacks the detail and support provided in the 100+ page investigation report.

4. *Releasing the investigation report would disclose “the strengths and weaknesses” of the NRC’s case. As a result, licensees may tailor their presentation to what the NRC knows or does not know, or dwell on the weaknesses of the NRC’s case.*

This justification runs contrary to the regulatory principles of transparency and fairness. It is also at odds with the NRC’s stated purpose of these proceedings to gain a common understanding of the facts of the case, including whether a violation occurred.²¹

5. *Releasing the investigation report will allow licensees to “more easily tailor or even fabricate evidence in an effort to deceive the NRC.” The licensee will have access to the information the NRC has, but the NRC may not have access to all of the information the licensee has.*

Licensees take seriously their relationship with their regulator, and do not “fabricate evidence” “to deceive” the NRC. We understand the importance of open and transparent information sharing, and furthermore are bound to provide complete and accurate information material to the NRC. The idea that a licensee would violate that fundamental regulatory tenet because it had access to an investigation report is nonsensical and not founded on decades of NRC practice.

6. *“Without the reports, licensees are more likely to conduct a more thorough and objective investigation of the facts.”*

In our experience, in most cases the licensee has conducted a thorough and objective investigation of the facts well before NRC’s OI gets underway. It is in the licensee’s interest to identify the issue, understand the significance and cause, and take prompt and effective corrective actions, all of which are made possible only through the licensee’s thorough investigation. These objectives are

²¹ Enforcement Manual at 52.

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no less present if the licensee now expects to receive a copy of the NRC's report a year or more after the fact.²²

7. *Releasing the investigation report will require the NRC to release the reports in response to FOIA requests as well, even before an enforcement decision is made.*

The significance of this disadvantage is not clear. And this result does not seem to have followed the NRC's decision to disclose investigation reports in discrimination cases. A review of recent FOIA requests listed on the NRC's website indicates the NRC receives only a handful of requests for discrimination-case investigation reports per year, none of which appear to be pre-decisional.

8. *The NRC will no longer have control of the investigation report, and cannot prevent disclosure prior to the final enforcement determination. "This could lead to unintended consequences for the alerger, the licensee, or witnesses."*

This concern is redundant of the disadvantages identified and addressed at numbers 1, 2, and 7. And to the extent there is a risk to the licensee associated with the premature disclosure of an investigation report, the licensee is disinclined to facilitate such a disclosure.

We do not find, in the concerns enumerated by the Staff in 2005, sufficient justification for withholding investigation reports from licensees at the pre-decisional phase of the enforcement process. Considering the last seventeen years of experience, these justifications do not hold. Moreover, nearly twenty years of experience producing investigation reports in discrimination cases have demonstrated the feasibility and effectiveness of this process.

There is no reason to distinguish between discrimination and nondiscrimination proceedings when it comes to disclosing investigation reports. The NRC's rationale and policy reasons in support of providing licensees with investigation reports in discrimination matters applies with equal force to nondiscrimination matters. In both cases, the identity of the alerger likely is known to the licensee, or can be protected using redactions. In both cases, the identity of witnesses can likewise be protected using redactions. In both cases, factual summaries are insufficient to provide an overview of investigation findings. In both cases, the reports may reveal the weaknesses of the NRC's position. In both cases, licensees are likely to conduct a thorough and objective investigation of the facts (and usually will have done so well in advance of this stage). And in both cases, disclosure of investigation reports facilitates a "common understanding of the facts," a stated objective of the pre-decisional process.²³

D. Disclosing Investigation Reports to Licensees Serves the Fundamental Purpose of Pre-Decisional Engagements

The objective of this pre-decisional enforcement process – to help the NRC make an informed enforcement decision based on a common understanding of the facts – is in stark

²² See *supra* note 4 (noting the objective of resolving OI cases in 12 months or less).

²³ See Enforcement Manual at 52.

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contrast to the NRC's refusal to share its investigation products with licensees.²⁴ Rather than achieve a "common understanding," this lopsided approach allows only the NRC to determine if the licensee's facts match its own. Licensees are denied a meaningful opportunity to address any inaccuracies, omissions, or misunderstandings contained in the investigation report that could result in the NRC issuing unwarranted enforcement.

Producing the report, on the other hand, allows licensees and the NRC to more readily identify where they are aligned, and where they are not. It provides an early, relatively inexpensive, and efficient means to ensure the NRC makes an informed enforcement decision based on a robust understanding of the facts.

Consider again the example offered at the beginning of this analysis, in which a licensee's investigation led to a finding of careless disregard, while the NRC's resulted in a finding of deliberate misconduct. Under the current regime, the licensee spends time at the pre-decisional stage defending its conclusion. It develops corrective actions consistent with its conclusion. And approximately one year later, it learns through a redacted investigation report obtained via FOIA that the subject confessed intentional misconduct to the NRC's investigator. Now consider a scenario in which the licensee receives, in advance of a pre-decisional enforcement conference, the NRC's investigation report recounting the subject's confession. Under those circumstances, the licensee and NRC could enter the pre-decisional enforcement process aligned on a "common understanding of the facts," and focus instead on cause, significance, and corrective actions.

For these reasons, Entergy encourages the NRC to reconsider releasing investigation reports for non-discrimination cases at the pre-decisional stage of the enforcement process.

²⁴ See *id.*

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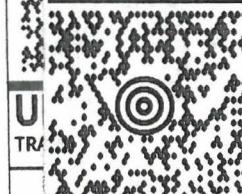
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