



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

April 18, 2024

ANO Site Vice President  
Arkansas Nuclear One  
Entergy Operations, Inc.  
N-TSB-58  
1448 S.R. 333  
Russellville, AR 72802

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 – SUMMARY OF REGULATORY AUDIT REGARDING LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-505, REVISION 2, “PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b” (EPID L-2023-LLA-0052)

Dear Sir or Madam:

By letter dated April 5, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23095A281), as supplemented by letter dated January 11, 2024 (ML24011A293), Entergy Operations, Inc. (Entergy, the licensee) requested an amendment to the Renewed Facility Operating License for Arkansas Nuclear One, Unit 2, to revise Technical Specifications to adopt risk-informed completion times based on Technical Specifications Task Force (TSTF) Traveler TSTF-505, Revision 2, “Provide Risk-Informed Extended Completion Times - RITSTF [Risk-Informed TSTF] Initiative 4b.”

To support its review, the U.S. Nuclear Regulatory Commission (NRC) staff conducted a virtual regulatory audit from August 15, 2023, through April 16, 2024, to support its review of the license amendment request. During the regulatory audit, the NRC staff reviewed documents and held discussions with the Entergy staff and its representatives. The regulatory audit summary is enclosed with this letter.

If you have any questions, please contact me at 301-415-4037 or by email at [Thomas.Wengert@nrc.gov](mailto:Thomas.Wengert@nrc.gov).

Sincerely,

*/RA/*

Thomas J. Wengert, Senior Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-368

Enclosure:  
Regulatory Audit Summary

cc: Listserv

OFFICE OF NUCLEAR REACTOR REGULATION

REGULATORY AUDIT SUMMARY

IN SUPPORT OF LICENSE AMENDMENT REQUEST TO ADOPT TSTF-505

ENERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NO. 50-368

1.0 BACKGROUND

By letter dated April 5, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23095A281), as supplemented by letter dated January 11, 2024 (ML24011A293), Entergy Operations, Inc. (Entergy, the licensee) submitted a license amendment request (LAR) for Arkansas Nuclear One, Unit 2 (ANO-2). The amendment would revise technical specification (TS) requirements to permit the use of risk-informed completion times (RICTs) for actions to be taken when limiting conditions for operation are not met. The proposed changes are based on Technical Specifications Task Force (TSTF) Traveler TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," dated July 2, 2018 (ML18183A493). The U.S. Nuclear Regulatory Commission (NRC) staff issued a final model safety evaluation approving TSTF-505, Revision 2, on November 21, 2018 (Package No. ML18269A041).

Information that the NRC staff relies upon to make the safety determination must be submitted on the docket. However, the NRC staff may review supporting information retained as records under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.71, "Maintenance of records, making of reports," and/or 10 CFR 54.37, "Additional records and recordkeeping requirements," which, although not required to be submitted as part of the licensing action, would help the NRC staff better understand the licensee's submitted information. To support its review of the LAR, the NRC staff issued a regulatory audit plan on August 9, 2023 (ML23209A602). The purpose of the audit is to review the documentation related to the subject of its application (e.g., calculations and reports) that were not submitted on the ANO-2 docket, to acquire additional understanding about the amendment request, and to determine whether additional information is needed to be docketed to complete the NRC staff's safety evaluation.

2.0 AUDIT ACTIVITIES

The NRC audit team consisted of NRC staff and NRC contract support from the Pacific Northwest National Laboratory (PNNL). Attachment 1 of this audit summary lists the individuals that took part in or attended the audit. The virtual regulatory audit was conducted from August 15, 2023, through April 16, 2024. Throughout the audit period, the NRC audit team used an internet-based portal provided by the licensee to review primarily non-docketed information related to the application. On September 22, 2023, the NRC staff submitted audit questions to the licensee (ML23269A023). On October 17 and 18, 2023, formal, virtual audit meetings were held with the licensee to facilitate technical discussions of the audit questions according to the audit plan.

During the audit, the licensee performed a demonstration of their PHOENIX system, which is risk management software used to assess the real-time risk of certain configurations implemented during the RICT. Technical discussions regarding probabilistic risk assessment focused on the consideration of shared systems, model uncertainty, fire protection, modeling of digital and instrumentation control, sources of uncertainty, and the treatment of FLEX (modeling of diverse and flexible coping strategies) equipment. Further discussions focused on electrical power distribution, external hazards, TSs, electrical engineering, and instrumentation and controls. On October 18, 2023, the NRC staff provided a brief conclusion of the formal, virtual audit meeting including audit objectives that were met and details on the path forward. The only deviation from the audit plan was a shortening of the formal audit by 1 day.

Non-docketed information provided by the licensee in response to audit questions and the formal meetings is listed in attachment 2 of this audit summary. At the conclusion of the meetings, Entergy agreed to provide a supplement to the application that would provide documentation on the docket of certain information requested by the NRC staff during the audit discussions. Although the formal audit meetings ended on October 18, 2023, NRC staff interactions with the licensee continued until April 16, 2024. In lieu of an exit meeting, the NRC's licensing project manager's discussion with the licensee on April 16, 2024, completed the regulatory audit related activities.

### 3.0 RESULTS OF THE AUDIT

By letter dated January 11, 2024 (ML24011A293), the licensee supplemented its application to address the items discussed during the audit. The NRC staff subsequently reviewed the licensee's supplement and determined that the supplement adequately captured the audit discussions and that any additional information the staff might need to complete its review of the LAR could be obtained outside of the audit process.

#### Attachments:

1. List of Participants
2. List of Documents Available for Staff Review During the Audit

## List of Participants

### **U.S. Nuclear Regulatory Commission (NRC) Audit Team**

#### **Name, Organization**

- April Pulvirenti, Probabilistic Risk Assessment (PRA) Licensing Branch A (APLA)
- Jeff Circle, APLA
- David Gennardo, APLA
- Bob Pascarelli, Chief, APLA
- Anne-Marie Grady, PRA Licensing Branch C (APLC)
- Alissa Neuhausen, APLC
- Sunwoo Park, APLC
- Norbert Carte, Instrumentation and Controls Branch (EICB)
- Ming Li, EICB
- Edmund Kleeh, Electrical Engineering Branch (EEEB)
- Angelo Stubbs, Containment and Plant Systems Branch (SCPB)
- Rick Scully, SCPB
- Michael Breach, Mechanical and Inservice Testing Branch (EMIB)
- Andrea Russell, Technical Specifications Branch (STSB)
- Thomas Wengert, Plant Licensing Branch IV (LPL4)
- Thomas Byrd, LPL4
- Samson Lee, LPL4
- Steve Short, Pacific Northwest National Laboratory

### **Entergy Operations, Inc. (Entergy) Audit Team**

#### **Name, Organization**

- Mark Reid, Arkansas Nuclear One (ANO) Licensing
- Kerry Gaston, Manager, Risk Engineering, Integrated Risk
- Ashton Williams, Supervisor, Risk Engineering, Integrated Risk
- Howard Mahan, Entergy Corporate Regulatory Assurance
- Nick Ledbetter, Supervisor, Engineering, Systems & Components
- Albert Martin, Manager, ANO Shift Operations
- Jason Hall, Engineer, Integrated Risk
- Trevor Thompson, Engineer, Integrated Risk
- Jeff Schappaugh, Jensen Hughes
- Joe Renner, Jensen Hughes
- Leo Shanley, Jensen Hughes

## **List of Documents Available for Staff Review During the Audit**

Entergy Operations, Inc. (Entergy, the licensee) provided supporting documentation (e.g., analyses, calculations, reports, drawings, and procedures) on the Arkansas Nuclear One, Unit 2 (ANO-2) document portal during the audit period. Below is a listing of the documents provided on the portal for the U.S. Nuclear Regulatory Commission (NRC) audit team's review during the audit.

### **Probabilistic Risk Assessment (PRA) Documents**

#### **Application-Specific Documents**

- ANO COPD-024, Revision 75, "Risk Assessment Guidelines"
- EN-DC-401, Revision 0, "Risk Informed Completion Time"
- EN-DC-402, Revision 0, "Calculation of RMATs [Risk Management Action Times] and RICTs [Risk-Informed Completion Times]"

#### **Full-Scope and Focused-Scope Peer Reviews and Facts and Observations (F&Os) Closure Reviews**

- PSA-ANO2-08-FSPR-01, "ANO1 PRA – Focused Scope Peer Review Independent Assessment Reviewing SBO [Station Blackout]/LOOP [Loss of Offsite Power] Event Trees and FLEX"
- PSA-ANO2-08-FNO-CL, Revision 0, "ANO-2 PRA Finding Level Fact and Observation Independent Assessment," April 9, 2020
- PSA-ANO2-08-FNO-CL-01, Revision 0, "ANO-2 PRA - Fact and Observation Closure by Independent Assessment," February 23, 2022
- PSA-ANO2-08-FNO-CL-02, Revision 0, "ANO-2 PRA - Fact and Observation Closure by Independent Assessment, Supporting SBO/LOOP Event Trees and FLEX," May 24, 2022
- WCAP-15910, Final Report, Revision 0, "ANO-2: Probabilistic Risk Assessment Peer Review Report" (Proprietary), November 2002
- ENTGS001-ANO2-PR-1000, Revision 0, "ANO-2 Power Plant Probabilistic Risk Assessment Focused-Scope Peer Review (LERF [Large Early Release Frequency])"
- ENTGANO150-REPT-002, Revision 0, "ANO-2 Internal Flooding Probabilistic Risk Assessment Peer Review"
- Kazarians and Associates, Inc., "Focused Scope Peer Review, ANO-2 Fire PRA, FSS-A, C, D, E and H," November 2012
- Jensen Hughes, "ANO-2 Fire PRA Focus Scope Peer Review Report," Revision 0, October 6, 2016
- Curtiss-Wright, "ANO-2 Fire HRA [Human Reliability Analysis] Peer Review Report," June 2014
- Westinghouse, "Focused-Scope Fire PRA Peer Review for ANO-2," December 2, 2011 (Proprietary)
- Westinghouse, "Fire PRA Peer Review Against the Fire PRA Standard Supporting Requirements from Section 4 of the ASME/ANS [American Society of Mechanical Engineers/American Nuclear Society] Standard for Level 1/LERF PRAs for Nuclear Power Plant Applications for the ANO-2 Fire PRA" (Proprietary), September 29, 2009
- Westinghouse, "RG [Regulatory Guide] 1.200 PRA Peer Review Against the ASME PRA Standard Requirements for the ANO-2 PRA, Final Deliverable" (Proprietary), July 30, 2008

### Key Assumptions and Sources of Uncertainty

- PSA-ANO2-06-4B SOU, Revision 0, “ANO-2 PRA - Assessment of Key Assumptions and Sources of Uncertainty for TSTF-505 (RICT) Submittal”

### Modeling of Diverse and Flexible Coping Strategies (FLEX)

- PSA-ANO1-01-HR, Revision 2, “ANO-1 PRA – Human Reliability Analysis”
- PSA-ANO2-01-SY-16, Revision 0, “ANO-2 – PRA – Appendix 16 Diverse and Flexible Coping Strategies (FLEX) Notebook”

### Shared or Cross-Tied System Modeling Documents

- PSA-ANO2-01-IE, Revision 2, “ANO-2 PRA – Initiating Events Analysis”
- PSA-ANO2-01-IF-AS, Revision 2, “ANO-2 PRA – Internal Flooding Accident Sequent Analysis”
- PSA-ANO2-01-IF-FA, Revision 2, “ANO-2 PRA – Internal Flooding Flood Area Definition Report”
- PSA-ANO2-01-SY-01, Revision 2, “ANO-2 PRA – Appendix 1 – AC [Alternating Current] Power System Notebook (AC)”
- PSA-ANO2-01-SY-06, Revision 2, “ANO-2 PRA - Appendix 6 – DC [Direct Current] Power System Notebook (DC)”
- PSA-ANO2-01-SY-07, Revision 2, “ANO-2 PRA - Appendix 7 – Emergency Feedwater System Notebook (EFW)”
- PSA-ANO2-01-SY-10, Revision 2, “ANO-2 PRA - Appendix 10 – Instrument Air System Notebook (IA)”
- PSA-ANO2-01-SY-16, Revision 0, “ANO-2 PRA - Appendix 16 – Diverse and Flexible Coping Strategies Notebook (FLEX)”
- “Shared Systems Information” – Discussion of shared systems

### Fire PRA

- PSA-ANO-03-FM-SDC, Revision 0, “Scenario Development Calculation Tool and Mathcad Verification Report”
- PSA-ANO-03-PP, Revision 1, “ANO Fire PRA Plant Partitioning and Fire Ignition Frequency Development”
- PSA-ANO2-03, Revision 2, “ANO-2 Fire PRA Summary Report NUREG/CR-6850 Task 16”
- PSA-ANO2-03-ES, Revision 0, “ANO-2 Component and Cable Selection Report”
- PSA-ANO2-03-FQ-01, Revision 0, “ANO-2 Fire PRA Uncertainty/Sensitivity Analysis”
- PSA-ANO2-03-FSS, Revision 0, “ANO-2 Fire Scenarios Report NUREG/CR-6850 Tasks 8 and 11”
- PSA-ANO2-03-FSS-01, Revision 0, “ANO-2 Multi-Compartment/Hot Gas Layer Analysis”
- PSA-ANO2-03-HRA, Revision 0, “ANO-2 Fire PRA Human Reliability Analysis (HRA) Notebook”
- PSA-ANO2-03-SOU, Revision 1, “ANO-2 Fire PRA Sources of Uncertainty”

### External Hazards

- Document No. 96-R-1006-02, Revision 1, “Individual Plant Examination of External Events (IPEEE) for Seismic Margin Assessments (SMA) at ANO-1”
- Document No. 96-R-2016-02, Revision 0, “Individual Plant Examination of External Events (IPEEE) for Seismic Margin Assessments (SMA) at ANO-2”
- PSA-ANO2-06-4B-SEIS, Revision 0, “ANO-2 PRA – Seismic CDF [Core Damage Frequency] and LERF Estimates for the TSTF [Technical Specifications Task Force]-505 (RICT) Program”
- PSA-ANO2-06-4B-TMPF, Revision 0, “ANO-2 Tornado Missile Penalty Factor Calculations for RICT Application”
- PSA-ANO2-06-4B-TRM, Revision 0, “ANO-1 Conservative Tornado Missile Model”

### Plant and PRA Configuration Control Procedures

- EN-NE-G-006, Revision 1, “Initiating Events Analysis for PSA”
- EN-NE-G-007, Revision 3, “Data Analysis for PRA Models”
- EN-NE-G-008, Revision 2, “Probabilistic Safety Assessment Success Criteria”
- EN-NE-G-009, Revision 1, “PSA [Probabilistic Safety Analysis] Accident Sequence Analysis”
- EN-NE-G-010, Revision 2, “Probabilistic Risk Analysis (PRA) System Analysis”
- EN-NE-G-011, Revision 1, “Probabilistic Safety Assessment Containment Performance Guidelines”
- EN-NE-G-012, Revision 1, “Probabilistic Safety Assessment Internal Flooding Analysis”
- EN-NE-G-013, Revision 4, “Human Reliability Analysis for PRA”
- EN-NE-G-014, Revision 1, “Probabilistic Safety Assessment Level 1 Quantification”
- EN-NE-G-015, Revision 5, “Risk Monitor Model Development and Control”
- EN-NE-G-016, Revision 2, “Loss of Offsite Power (LOSP) Analysis”
- EN-NE-G-017, Revision 1, “Probabilistic Safety Assessment Uncertainty Analysis”
- EN-NE-G-025, Revision 1, “Probabilistic Safety Assessment Documentation”
- EN-NE-G-026, Revision 8, “(PRA) Probabilistic Risk Analysis Applications Guideline”
- EN-NE-G-027, Revision 1, “Probabilistic Safety Assessment Terms and Definitions”
- EN-NE-G-035, Revision 1, “Fire PRA Maintenance and Use”

### Design Details of Systems Shared or Cross-Tied Between ANO-1 and ANO-2

- 0-TOP-10, Revision 5, “Electrical Separation”
- 0-TOP-13, Revision 8, “Control Room Habitability Topical”
- E-4, Sheet 2, Revision 1, “Single Line Relay and Metering Diagram, Common Feedwater System, 4.16 kV [Kilovolt] SWGR [Switchgear] Bus A-15”
- E-4, Sheet 3, Revision 4, “Single Line Relay and Metering Diagram, Common Feedwater System, 4.16 kV SWGR Bus A-19”
- M-2218, Sheet 2, Revision 76, “P&ID [Piping and Instrumentation Diagram]- Instrument Air System”
- M-2218, Sheet 3, Revision 98, “P&ID - Instrument Air System”
- M-2221, Sheet 2, Revision 12, “P&ID – Control and Computer Room Emergency HVAC [Heating, Ventilation, and Air Conditioning] Freon System”
- Upper Level Document (ULD)-0-SYS-02, Revision 16, “Offsite Power System”
- ULD-0-SYS-07, Revision 4, “ANO Emergency Lighting System”



- ULD-0-SYS-09, Revision 7, “Fire Protection System”
- ULD-0-SYS-19, Revision 2, “Alternate AC Generator System”
- ULD-2-SYS-01, Revision 10, “Emergency Diesel Generator System”
- System Training Manual (STM) 1-26, Revision 4, “Common Feedwater System”

### **Electrical Engineering Documents**

#### **Load List for Each Safety-Related Bus**

- Document No. 2107.001 Change No. 138, “Electrical System Operation”
- Document No. 2107.002 Change No. 045, “ESF [Engineered Safety Features] Electrical System Operation”

#### **Plant Procedures Related to the Risk Management Action for the Electrical Power Systems**

- ANO COPD-024, Revision 75, “Risk Assessment Guidelines”
- Waterford Administrative Procedure OI-037-000, Revision 321, “WF3 [Waterford 3] Operations’ Risk Assessment Guideline”

#### **Single Line Diagrams**

- E-2001, Sheet 1, Revision 42, “Station Single Line Diagram”
- E-2006, Sheet 1, Revision 46, “Low Voltage Safety Systems Power Supplies”
- E-2017, Sheet 1A, Revision 10, “Green Train Vital AC and 125V DC”
- E-2017, Sheet 1B, Revision 9, “Red Train Vital AC and 125V DC”
- E-2017, Sheet 1C, Revision 0, “Non-Vital Switchgear Backup DC Control Power”

### **Mechanical Engineering Drawings**

#### **Piping and Instrumentation Diagrams**

- M-2202, Sheet 1, Revision 54, “Main Steam”
- M-2204, Sheet 1, Revision 100, “Condensate and Feedwater”
- M-2204, Sheet 2, Revision 85, “Condensate and Feedwater”
- M-2204, Sheet 3, Revision 48, “Condensate and Feedwater”
- M-2204, Sheet 4, Revision 73, “Emergency Feedwater”
- M-2206, Sheet 1, Revision 56, “Steam Generator Secondary System”
- M-2206, Sheet 2, Revision 31, “Steam Generator Secondary System”
- M-2209, Sheet 1, Revision 128, “Circulating Water Systems”
- M-2210, Sheet 1, Revision 93, “Service Water System”
- M-2210, Sheet 2, Revision 86, “Service Water System”
- M-2210, Sheet 3, Revision 93, “Service Water System”
- M-2211, Sheet 1, Revision 75, “Auxiliary Cooling Water”
- M-2214, Sheet 1, Revision 87, “Boron Management System”
- M-2217, Sheet 1, Revision 65, “Emergency Diesel Generator Fuel Oil System”
- M-2217, Sheet 2, Revision 34, “Emergency Diesel Generator Starting Air System”
- M-2217, Sheet 3, Revision 9, “Emergency Diesel Generator Auxiliary Systems”
- M-2230, Sheet 1, Revision 82, “Reactor Coolant System”
- M-2230, Sheet 2, Revision 46, “Reactor Coolant System”

- M-2231, Sheet 1, Revision, 148, "Chemical and Volume Control System"
- M-2231, Sheet 2, Revision 77, "Chemical and Volume Control System"
- M-2232, Sheet 1, Revision 123, "Safety Injection System"
- M-2232, Sheet 2, Revision 3, "High Pressure Safety Injection"
- M-2235, Sheet 1, Revision 76, "Fuel Pool System"
- M-2236, Sheet 1, Revision 96, "Containment Spray System"
- M-2236, Sheet 2, Revision 18, "Containment Spray System"
- M-2238, Sheet 1, Revision 58, "Reactor Coolant Pump Connections"

### **Miscellaneous ULDs**

- 2-SYS-01, Revision 10, "Emergency Diesel Generator System"
- 2-SYS-02, Revision 6, "High Pressure Safety Injection System"
- 2-SYS-03, Revision 7, "125 Volt DC System"
- 2-SYS-04, Revision 5, "Low Pressure Safety Injection and Shutdown Cooling Systems"
- 2-SYS-05, Revision 7, "Containment Spray System"
- 2-SYS-09, Revision 7, Engineered Safety Features Actuation System"
- 2-SYS-10, Revision 14, "Service Water System"
- 2-SYS-12, Revision 12, Emergency Feedwater System"
- 2-SYS-14, Revision 2, "Reactor Coolant System"
- 2-SYS-15, Revision 5, "Reactor Protection and Core Protection Calculator Systems"
- 2-SYS-16, Revision 8, "4.16 KV System"
- 2-SYS-21, Revision 8, "Main Steam System"
- 2-SYS-22, Revision 2, "Reactor Regulation System"
- 2-SYS-34, Revision 2, "Diverse Scram and Diverse Emergency Feedwater Actuation Systems"
- 2-SYS-36, Revision 2, "Control Element Drive Mechanism (CEDM) System"

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 – SUMMARY OF REGULATORY AUDIT REGARDING LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-505, REVISION 2, “PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES - RITSTF INITIATIVE 4b” (EPID L-2023-LLA-0052) DATED APRIL 18, 2024

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**\*by email**

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