



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

September 11, 2024

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION, UNIT NO. 1 – REQUEST FOR PARTIAL SITE
RELEASE FOR FACILITY OPERATING LICENSE NO. NPF-62 (EPID: L-2023-
LLA-0088)

Dear David Rhoades:

By letter to the U.S. Nuclear Regulatory Commission (NRC, the Commission) dated June 7, 2023 (Agencywide Document Access and Management System (ADAMS) Accession No. ML23158A262), as supplemented by letters dated August 3, 2023 (ML23215A114), and February 8, 2024 (ML24039A182), Constellation Energy Generation LLC (CEG, the licensee) submitted a request to the NRC for approval of a partial site release of Clinton Power Station, Unit No. 1 (CPS). The proposed action would release part of the plant site consisting of 172.7 acres of land for the Clinton Lake Marina for unrestricted use. This portion of the property is located about 1.5 miles south of the plant site. CEG requests approval for release of this property from its Facility Operating License No. NPF-62. The licensee stated that it discovered that the prior NRC approval required under 10 CFR 50.83, "Release of part of a power reactor facility or site for unrestricted use," was not obtained before the transfer of non-impacted land from the CPS site. Specifically, on September 17, 2003, a Quit Claim Deed was executed by AmerGen Energy Company, LLC to transfer the 172.7 acres of land for the Clinton Lake Marina to DeWitt County, Illinois.

Title 10 of the *Code of Federal Regulations* (10 CFR), section 50.83, requires written approval from the NRC prior to release for unrestricted use of any part of a power reactor site. The NRC staff reviewed the above referenced letters and, based on the enclosed safety evaluation, the NRC staff concludes that the request to release this part of the CPS site for unrestricted use (1) does not require an amendment to the license, and (2) with the exception of the licensee's timing of its request, meets the requirements in 10 CFR 50.83 to approve the release of the land. Pursuant to 10 CFR 50.83(c)(3), the release of the property as described above and in CEG's submittals, is approved.

As required by 10 CFR 50.83(f), the NRC staff noticed receipt of the release approval request and made the request available for public comment. The NRC staff published a notice in the *Federal Register* on July 9, 2024 (89 FR 56445), and in the *Clinton Journal* on July 19, 2024, soliciting public comments and notifying the public of the date, time, and location of a public meeting regarding the request, which was held on July 24, 2024. No public comments were received.

A copy of the Safety Evaluation is also enclosed.

Sincerely,

/RA/

Joel S. Wiebe, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure:
Safety Evaluation

cc w/encl: Listserv

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO PARTIAL SITE RELEASE REQUEST FOR

FACILITY OPERATING LICENSE NO. NPF-62

CONSTELLATION ENERGY GENERATION, LLC

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

1.0 INTRODUCTION

By letter to the U.S. Nuclear Regulatory Commission (NRC, the Commission) dated June 7, 2023 (Agencywide Document Access and Management System (ADAMS) Accession No. ML23158A262), as supplemented by letters dated August 3, 2023 (ML23215A114), and February 8, 2024 (ML24039A182), Constellation Energy Generation LLC (CEG, the licensee) submitted a request to the NRC for approval of a partial site release at Clinton Power Station, Unit No. 1 (CPS, Clinton). The proposed action would release 172.7 acres of land from Facility Operating License No. NPF-62 for the Clinton Lake Marina. This portion of the property is located about 1.5 miles south of the plant site. The licensee stated that it discovered that the prior NRC approval required under 10 CFR 50.83, "Release of part of a power reactor facility or site for unrestricted use," was not obtained before the transfer of non-impacted land from the CPS site. Specifically, on September 17, 2003, a Quit Claim Deed was executed by AmerGen Energy Company, LLC to transfer the 172.7 acres of land for the Clinton Lake Marina to DeWitt County, Illinois.

2.0 REGULATORY EVALUATION

Section 50.83, "Release of part of a power reactor facility or site for unrestricted use," of part 50 of Title 10 of the *Code of Federal Regulations* (i.e., 10 CFR 50.83), establishes the following requirements with respect to the release of any part of a power reactor site for unrestricted use:

- a. Prior written NRC approval is required to release part of a facility or site for unrestricted use at any time before receiving approval of a license termination plan. Section 50.75 [of 10 CFR part 50] specifies recordkeeping requirements associated with partial release. Nuclear power reactor licensees seeking NRC approval shall:
 1. Evaluate the effect of releasing the property to ensure that:
 - i. The dose to individual members of the public does not exceed the limits and standards of 10 CFR Part 20, Subpart D;
 - ii. There is no reduction in the effectiveness of emergency planning or physical security;
 - iii. Effluent releases remain within license conditions;

- iv. The environmental monitoring program and offsite dose calculation manual are revised to account for the changes;
 - v. The siting criteria of 10 CFR Part 100 continue to be met; and
 - vi. All other applicable statutory and regulatory requirements continue to be met.
- 2. Perform a historical site assessment [HSA] of the part of the facility or site to be released;
 - 3. Perform surveys adequate to demonstrate compliance with the radiological criteria for unrestricted use specified in 10 CFR 20.1402 for impacted areas.
- b. For release of non-impacted areas, the licensee may submit a written request for NRC approval of the release if a license amendment is not otherwise required. The request submittal must include –
- 1. The results of the evaluations performed in accordance with paragraphs (a)(1) and (a)(2) of this section [above];
 - 2. A description of the part of the facility or site to be released;
 - 3. The schedule for release of the property;
 - 4. The results of the evaluations performed in accordance with [10 CFR] 50.59; and
 - 5. A discussion that provides the reasons for concluding that the environmental impacts associated with the licensee's proposed release of the property will be bounded by appropriate previously issued environmental impact statements.
- c. After receiving an approval request from the licensee for the release of a non-impacted area, the NRC shall
- 1. Determine whether the licensee has adequately evaluated the effect of releasing the property as required by [10 CFR 50.83(a)(1)];
 - 2. Determine whether the licensee's classification of any release areas as non-impacted is adequately justified; and
 - 3. Upon determining that the licensee's submittal is adequate, inform the licensee in writing that the release is approved.

In addition to the above requirements, 10 CFR 50.75(g) requires that each licensee keep records of information important to the safe and effective decommissioning of the facility, which includes the plant site, until the license is terminated by the Commission. Pursuant to paragraph 50.75(g)(4), the licensee is required to keep the following records:

- i. The licensed site area, as originally licensed, which must include a site map and any acquisition or use of property outside the originally licensed site area for the purpose of receiving, possessing, or using licensed materials;

- ii. The licensed activities carried out on the acquired or used property; and
- iii. The release and final disposition of any property recorded in [10 CFR 50.75(g)(4)(i)], the historical site assessment performed for the release, radiation surveys performed to support release of the property, submittals to the NRC made in accordance with [10 CFR] 50.83, and the methods employed to ensure that the property met the radiological criteria of 10 CFR Part 20, Subpart E, at the time the property was released.

“Non-impacted areas” is defined in 10 CFR 50.2 as “the areas with no reasonable potential for residual radioactivity in excess of natural background or fallout levels.”

3.0 BACKGROUND

CEG reported that the required approval in accordance with 10 CFR 50.83, "Release of part of a power reactor facility or site for unrestricted use," was not obtained prior to the transfer of non-impacted land from the CPS site. In September 2003, a Quit Claim Deed was executed by AmerGen Energy Company, LLC to transfer 172.7 acres of land for the Clinton Lake Marina to DeWitt County, Illinois. Thus, CEG is requesting approval to remove this portion of the CPS site, as described above in Section 1.0.

The total land that was transferred was 172.7 acres located on the far side of Clinton Lake with respect to CPS. The portion of land is located approximately 1.5 miles south of the plant site, located outside of the Exclusion Zone and within the Low Population Zone (2.5 miles).

The property is not located within the approximately 150 acres that comprise the Protected Area and Owner Controlled Area of the plant and will have no effect on the cooling function of the lake, which is designed to provide cooling water to the CPS and to remove the design heat load from the plant.

4.0 Technical Evaluation

4.1 Licensee’s Assessment of the Property to be Released

In accordance with 10 CFR 50.83, the licensee performed an HSA of the property. The HSA is provided in the licensee’s submittal dated June 7, 2023. The licensee indicated the Annual Radioactive Effluent Release Reports and the Annual Radiological Environmental Operating Reports submitted to the NRC each year contain information about the radioactive material on the property being transferred and about the magnitude of doses an individual would receive on the property being transferred. The Annual Radioactive Effluent Release Reports show gaseous and liquid effluents released at CPS, and show that it continues to be within the required limits for offsite public dose. The licensee indicated that thousands of analyses have been performed on thousands of environmental samples and collected as part of the CPS Radiological Environmental Monitoring Program (REMP), and that comparisons of that data with background samples collected during the site’s preoperational period indicate there has been no adverse radiological impact on this property. The licensee indicated these annual reports indicate radioactive effluents from CPS have been less than allowed by its Offsite Dose Calculation Manual (ODCM) and 10 CFR Part 50 Appendix I. The licensee indicated a review of the decommissioning file (maintained in accordance with 10 CFR 50.75(g)) revealed no records of any spills, leaks, or uncontrolled releases of radioactive material on the property being transferred.

The licensee's HSA indicated the following:

1. The land has not been used for plant operations.
2. The land has not been used for storage of any radioactive material or waste.
3. There are no event records that any spills, leaks, or uncontrolled release of radioactive material have ever occurred on the land.
4. The last liquid radioactive release from the plant was in 1992 in the circulating water discharge canal which is on the north side of Salt Fork. This property is located on the south side of Salt Fork and not in the groundwater gradient of the discharge canal.
5. No state or local agency has required additional groundwater monitoring or remedial actions on the property.
6. Three separate hydrogeologic studies have been conducted at CPS, in accordance with NEI 07-07, "Industry Ground Water Protection Initiative," (ML072610036) , between 2006 and 2010. This property does not impact these studies.
7. The Radioactive Groundwater Protection Program conducts periodic monitoring of shallow groundwater. This program shows that shallow groundwater continues to flow predominantly towards the lake. This property is located on the south side of Salt Fork, whereas the plant is on the north side of Salt Fork; therefore, no contamination of this property through normal groundwater gradient flow can occur from plant discharges.
8. In assessing all the data gathered for the REMP annual report and comparing each year's results with preoperational baseline data, it is concluded that the operation of Clinton has had no adverse radiological impact on this property.

The licensee indicated it continues to implement a radiation protection program commensurate with 10 CFR Part 20 and Clinton Technical Specifications 5.6.2 and 5.6.3. The licensee also indicated that the property subject to the transfer request has no reasonable potential for residual radioactivity in excess of natural background or fallout levels, and that therefore the property qualifies as a "non-impacted area" as defined in 10 CFR 50.2.

The licensee evaluated the property transfer with respect to the criteria in 10 CFR 50.83(a)(1)(i)-(vi) and concluded the following:

- i. The dose to individual members of the public does not exceed the limits and standards of 10 CFR Part 20, Subpart D because of the strict control of radioactive effluents, use of radiation monitoring systems within the plant, and the surveillance and analyses performed as part of the REMP. The release of this property does not change any controls used to comply with dose limits for individual members of the public. CPS has determined that the property was never used for any radiological purposes.
- ii. Impact on the effectiveness of emergency planning or physical security has been evaluated. No credit is taken for this land in either the Emergency Plan or Security Plan. Therefore, the transfer of this property has no adverse effect on either plan.

- iii. Effluent releases remain within license conditions and, because the property is distant from the plant site and is not down-gradient of discharge structures, it does not have the potential to be affected by effluent releases. The plant programs to maintain effluent releases within license conditions remain in effect and the transfer of this property does not impact those programs. Therefore, the effluent releases from Clinton will remain within license conditions.
- iv. The transfer of this property does not have any effect on the environmental monitoring program and ODCM revisions, and neither requires revision as a result of this property transfer.
- v. The siting criteria of 10 CFR Part 100 continue to be met. The transfer of this property has been reviewed with respect to the siting criteria in 10 CFR Part 100 and it has no effect on meeting these criteria. In addition, the limits of 10 CFR 50.67, Alternative Source Term, have been reviewed and the transfer has no effect on meeting these criteria.
- vi. Other statutory and regulatory requirements continue to be met. There are no changes to Clinton's policies and procedures to ensure that statutory and regulatory requirements continue to be met as a result of this property transfer.

The licensee concluded that this property transfer has no impact on CPS's continued compliance with applicable NRC regulatory standards.

In its submittals dated August 3, 2023, and February 8, 2024, the licensee provided information pursuant to 10 CFR 50.83(b)(5), which requires that any request for NRC approval of a release of non-impacted areas must include the reasons for concluding that the environmental impacts associated with the release of the property will be bounded by appropriate previously issued environmental impact statements (EISs). The original Final Environmental Statement (FES) for CPS was issued in May 1982 (ML19079A225). In addition, an EIS associated with an early site permit for the construction and operation of a new nuclear power generating facility, adjacent to and within the confines of the current CPS, Unit 1, site, was issued in July 2006 (ML061930264).

CEG reviewed the environmental impacts associated with the release of this property and considered those impacts in light of the 1982 FES and the 2006 EIS in its evaluation and did not identify any significant new environmental impacts or significant changes from the environmental impacts previously assessed by the NRC. The licensee stated that the land transfer has no measurable increase in offsite dose consequences and no change in effluent releases. The CPS REMP accounts for the revised site area boundary, and no increases in effects are anticipated. Therefore, the licensee concluded that the environmental impacts associated with the proposed release of the property are bounded by the NRC's previous environmental reviews for CPS.

4.2 NRC Staff Evaluation of the Property to be Released

The NRC staff has reviewed the licensee's application for the release of part of the CPS site for unrestricted use. The requested release of part of the plant site pertains to 172.7 acres of land for the Clinton Lake Marina. This portion of the property is located about 1.5 miles south of the plant site. Prior to the September 17, 2003, transfer of the land to DeWitt County, the land for the marina was previously leased to an outside operator. This area is used for recreational

activities such as boat rentals, limited food and beverage service, slip rentals, and propane tank exchange. Release of this property is not anticipated to degrade the environment, impact public health, or impact local land uses.

The licensee addressed whether environmental impacts associated with the proposed release of the property are bounded by previously issued EISs. The land that was transferred was part of the original CPS site and the operation of CPS was addressed in the FES related to the operation of CPS, Unit 1. The licensee identified no environmental concerns associated with the release of the 172.7-acre parcel of land. The transfer of this land will not impact ongoing plant operation and monitoring. Therefore, the environmental impacts associated with plant operation will not change as a result of this property transfer. Thus, the NRC staff agrees with the licensee in its conclusion that the environmental impacts associated with the release of the property are bounded by the FES.

Transfer of the property will not result in public or environmental exposure to radioactive contamination. There are no known records of any spills, leaks, or uncontrolled release of radioactive material on this parcel of land. The property was not used for any activities that could have contaminated the property. Contaminated groundwater from power plant operations does not occur and is very unlikely to occur under the property.

A historical cultural review was performed during the initial stages of planning and construction of Lake Clinton. The 1982 FES and 2006 EIS did not identify any historic and cultural properties. A recent search of historic properties or cultural sites within 6 miles of CPS has not identified any historic and cultural resources in the area of the Clinton Lake Marina. Therefore, transfer of this property will not affect any known historic or cultural sites. This area was previously being leased to an outside operator and being used for the purposes described above.

Based on the property being a non-impacted area, the NRC staff reviewed the requirements in 10 CFR 50.83(c)(1) and (2) for releasing non-impacted areas for unrestricted use and determined that the licensee's submittal has sufficiently addressed the requirements as follows:

The requirements in section 50.83(c)(1) are addressed by the licensee as listed in Section 4.1 of this safety evaluation (SE), and the NRC's assessment is as follows:

- i. § 50.83(a)(1)(i) -- Ensure that the dose to individual members of the public does not exceed the limits and standards of 10 CFR Part 20, Subpart D. The NRC finds that the licensee's surveillance and analyses conducted as part of its REMP provides sufficient information to conclude that the doses to members of the public on the property are currently within 10 CFR Part 20, Subpart D, limits and are expected to remain within those limits. The NRC staff concludes that additional assurance is provided by the licensee's radiation monitoring systems and the fact that no licensed activities were ever conducted on this property.
- ii. § 50.83(a)(1)(ii) -- Ensure that there is no reduction in the effectiveness of emergency planning or physical security. The NRC staff has evaluated the release of the property and finds that the licensee does not take credit for the property in either the Emergency Plan or Security Plan. The NRC staff concludes that the release of the land for unrestricted use will not reduce the effectiveness of the emergency plan or physical security.

- iii. § 50.83(a)(1)(iii) – Ensure effluent releases remain within the license conditions. The NRC staff has evaluated the release of the property and finds that the property is distant from the plant site and structures that would have any potential for effluent releases. After the release of the land, the use of the property by members of the public will not create new pathways of exposure that would cause radioactive releases from the site to exceed license conditions. The NRC staff finds sufficient information in the licensee’s letter dated June 7, 2023, as supplemented by letters dated August 3, 2023, and February 8, 2024, to conclude that the licensee’s site programs, which maintain effluent releases from Clinton within license conditions, will remain in effect and that this transfer of property does not impact those programs. Therefore, the NRC staff concludes the release of this land for unrestricted use will not impact the licensee’s ability to maintain effluent releases from Clinton within license conditions.
- iv. § 50.83(a)(1)(iv) – Ensure the environmental monitoring program and ODCM are revised to account for the change. The NRC staff recognizes a radiological exposure pathway as the vehicle by which the public may become exposed to radioactivity released from nuclear facilities. The major pathways of concern are those that could cause the highest calculated radiation dose. These pathways are determined from the type and amount of radioactive material released, the environmental transport mechanism, and how the plant environs are used (i.e., residence, gardens, etc.). The environmental transport mechanism includes the historical meteorological characteristics of the area that are defined by wind speed and wind direction. This information is used to evaluate how the radionuclides will be distributed within the surrounding area. The most important factor in evaluating the exposure pathway is the use of the environment by the public living around CPS. Factors such as location of homes in the area, use of cattle for milk, and the growing of gardens for vegetable consumption are important considerations when evaluating exposure pathways. In its submittals dated August 3, 2023, and February 8, 2024, the licensee states that the release of the land has no effect on the environmental monitoring program, the ODCM, or the established plant programs used to maintain effluent releases within license conditions. Since the use of the land as a marina will not change after the release, the NRC staff concludes the current radiological effluent control program (RECP), the REMP, and the ODCM are not impacted by the transfer of this land, and no changes to the RECP, the REMP, or the ODCM would be required by the release of this land for unrestricted use.
- v. § 50.83(a)(1)(v) – Ensure the siting criteria of 10 CFR Part 100 continue to be met. The purpose of 10 CFR Part 100 is to help assure that radiological doses from normal operation and postulated accidents will be acceptably low, that natural phenomena and potential man-made hazards will be appropriately accounted for in the design of the plant, that site characteristics are such that adequate security measures to protect the plant can be developed, and that physical characteristics unique to the proposed site that could pose a significant impediment to the development of emergency plans are identified. The NRC staff recognizes that the population density and use characteristics of the site environs, including the exclusion area, low population zone, and population center distance have the possibility of being affected when releasing part of a site for unrestricted use. The NRC staff finds that the property is not specifically listed in the license or the Technical Specifications; is not within the security fence of the plant; is 1.5 miles from the plant site; is not within the exclusion zone (0.6 mi); has no effect on the cooling function of the lake; is not related to either the safety-related structures, systems, or components or the effluent discharge equipment of the plant; and has no effect on

plant operation. Accordingly, the NRC staff concludes that release of the property for unrestricted use will have no adverse effect on the siting criteria of 10 CFR Part 100.

- vi. § 50.83(a)(1)(vi) – Ensure that all other applicable statutory and regulatory requirements continue to be met. The NRC staff concludes that this requirement will be met through license requirements, Technical Specifications, safety analysis report updates, and the inspection process.

Based on the NRC staff evaluation of the items in (i)-(vi) above, the NRC concludes the requirements of 50.83(c)(1) are satisfied.

The requirements in section 50.83(c)(2) are addressed by the licensee as listed in Section 4.1 of this SE, and the NRC's assessment is as follows:

- i. § 50.83(c)(2) - After receiving an approval request from the licensee for the release of a non-impacted area, the NRC shall determine whether the licensee's classification of any release areas as non-impacted is adequately justified. The NRC (in 10 CFR 50.2) defines non-impacted areas as "areas with no reasonable potential for residual radioactivity in excess of natural background or fallout levels." The NRC (in 10 CFR 20.1003) defines residual radioactivity as "radioactivity in structures, materials, soils, groundwater, and other media at a site resulting from activities under the licensee's control. This includes radioactivity from all licensed and unlicensed sources used by the licensee but excludes background radiation. It also includes radioactive materials remaining at the site as a result of routine or accidental releases of radioactive material at the site and previous burials at the site, even if those burials were made in accordance with the provisions of 10 CFR Part 20."

Based on the information supplied by CEG and the definitions above, the NRC finds the property in question is distant from the plant site and structures that are potential sources of radioactive effluents. The NRC evaluation of the information submitted by the licensee indicates that there have been no routine liquid effluents discharged at the plant, any mobile radioactive materials that may have been released in abnormal liquid effluents (e.g., spills or leaks) from the site to the ground would enter the shallow groundwater and (given sufficient time and absent radioactive decay) be transported to the Clinton Lake Impoundment. As a result, the NRC staff concludes that no radioactive liquid effluents (either normal or abnormal) have a reasonable potential to leave residual radioactivity in excess of natural background or fallout levels on the property in question.

The NRC staff also evaluated potential gaseous releases to determine the potential to leave residual radioactivity in excess of natural background or fallout levels on the property in question. The NRC staff finds that the "S" meteorological sector in which the property is located was the sector least affected by routine annual average gaseous effluents. As a result, any deposition resulting from routine, annual average radioactive effluents on the property would be less than that found in the other meteorological sectors. The licensee's REMP routinely measures air particulates and deposition and has found results are consistent with the preoperational, natural background levels of radiation. The REMP results indicate the operation of the plant has not affected this property.

Therefore, the NRC staff concludes the property meets the definition of a non-impacted area in accordance with 10 CFR 50.2. The NRC staff has evaluated the release of the property and based on the licensee's environmental assessment of the property, the NRC staff concludes the

property has no reasonable potential for residual radioactivity in excess of natural background or fallout levels. As a result, the NRC staff finds that the licensee's classification of the property as non-impacted is adequately justified and, therefore, that the requirement in 10 CFR 50.83(c)(2) is met.

Based on the above considerations, the NRC staff concludes that the licensee has met the requirements in 10 CFR 50.83(c)(1) and (2) for releasing non-impacted areas for unrestricted use and determines that a license amendment is not required.

5.0 CONCLUSION

The licensee requested approval for the release of the land described in Section 3.0 of this SE, which is currently part of the CPS site, for unrestricted use. Based on the NRC staff's evaluation of this partial site release application, the NRC staff concludes that the licensee's submittal has adequately:

1. assessed the property to be released,
2. justified the property as a non-impacted area and no amendment to the license is needed, and
3. addressed the effect of releasing the property for unrestricted use.

The NRC staff concludes that the licensee's request meets the requirements in 10 CFR 50.83. Therefore, the NRC staff approves the release of the property as described above and in CEG's submittals.

Primary Reviewer: A. Waldron

Date: September 11, 2024

SUBJECT: CLINTON POWER STATION, UNIT NO. 1 – REQUEST FOR PARTIAL SITE
RELEASE FOR FACILITY OPERATING LICENSE NO. NPF-62 (EPID: L-2023-
LLA-0088) DATED SEPTEMBER 11, 2024

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OFFICE	OGC NLO	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
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DATE	9/4/2024	9/11/2024	9/11/2024

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