



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

August 19, 2015

Mr. Thomas J. Palmisano
Vice President and Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3 – REVIEW
AND APPROVAL OF THE IRRADIATED FUEL MANAGEMENT PLAN
(TAC NOS. MF4894 AND MF4895)

Dear Mr. Palmisano:

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(bb), licensees of nuclear power plants within 2 years following permanent cessation of operation must submit to the U.S. Nuclear Regulatory Commission (NRC), for review and preliminary approval, the program by which the licensee intends to manage and provide funding for the management of all irradiated fuel at the reactor, until title and possession of the fuel is transferred to the Secretary of Energy for its ultimate disposal in a repository. In addition, pursuant to Section 50.82(a)(4)(i), the licensee must submit a post-shutdown decommissioning activities report (PSDAR). A site-specific decommissioning cost estimate (DCE), containing the projected cost of managing irradiated fuel, is part of the PSDAR. On June 12, 2013, SCE informed the NRC that it had permanently ceased operations of SONGS Units 2 and 3 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML131640201).

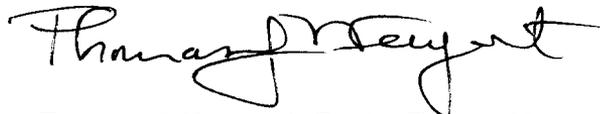
By letter dated September 23, 2014 (ADAMS Accession No. ML14269A032), Southern California Edison Company (SCE, the licensee) submitted the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, Irradiated Fuel Management Plan (IFMP) to the NRC. SCE concurrently submitted the PSDAR and the site-specific DCE under separate cover letters (ADAMS Accession Nos. ML14269A033 and ML14269A034, respectively). As approved by exemption dated September 5, 2014, (ADAMS Accession No. ML14101A132), SCE uses the nuclear decommissioning trust fund (DTF) for license termination, irradiated fuel management and site restoration expenditures. While costs associated with all of these activities are discussed in the IFMP, the enclosed review focuses on irradiated fuel management. The NRC staff is conducting a separate review of the PSDAR and site-specific DCE.

Based on its review of SCE's submittal, the NRC staff finds that the licensee's program to manage and provide funding for the management of all irradiated fuel is adequate and provides sufficient detail regarding the associated funding mechanisms. Further, the staff has determined that the elected actions within the program are consistent with NRC requirements for licensed possession of irradiated nuclear fuel and that these actions will be implemented in a timely basis. Therefore, the staff concludes that the SONGS, Units 2 and 3, IFMP complies with 10 CFR 50.54(bb) and approves the plan on a preliminary basis. The NRC staff's review of the SONGS IFMP is enclosed.

The NRC staff recognizes that the IFMP analysis is based on a reported DTF balance that may fluctuate over time. Should a material decline in the DTF balance occur, the staff's analysis and findings may be impacted. However, in accordance with 10 CFR 50.82(a)(8)(vii), the licensee must annually submit to the NRC, by March 31, a report on the status of its funding for managing irradiated fuel. Further, in accordance with 10 CFR 50.54(bb), the licensee shall notify the NRC of any significant changes to the IFMP. Accordingly, the regulations provide a means of informing the NRC staff of fluctuations in the reported DTF balance and significant changes to the IFMP.

If you have any questions, please contact me at 301-415-4037 or Thomas.Wengert@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is fluid and cursive, with the first name being the most prominent.

Thomas J. Wengert, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure:
Safety Evaluation

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SONGS, Units 2 and 3, have been owned by four entities. SCE is authorized to act as the agent for the other owners. The percent ownership of both reactors is as follows: SCE owns 78.21 percent; San Diego Gas & Electric Company owns 20 percent; and Riverside owns 1.79 percent, with Anaheim providing decommissioning funding, despite not currently owning any percentage of the facilities. The relative obligation for decommissioning varies by unit and entity as follows:

SONGS 1	20%	0%	0%	80%
SONGS 2	20%	1.79%	2.4737%	75.7363%
SONGS 3	20%	1.79%	2.4625%	75.7475%
Common Facilities (Units 2 & 3)	20%	1.79%	2.4681%	75.7419%
SONGS 1 Fuel	20%	0%	0%	80%
SONGS 2/3 Fuel	20%	1.79%	2.3398%	75.8702%
ISFSI Maintenance and D&D	20%	1.6066%	2.2686%	76.1248%
San Diego Switchyard	100%	0%	0%	0%
Edison Switchyard	0%	0%	0%	100%
Interconnection Facilities	50%	0%	0%	50%
Nuclear Fuel Cancellation Charges	20%	1.79%	0%	78.21%

By letter dated June 12, 2013, SCE notified the NRC of its permanent cessation of operations of Units 2 and 3, effective on June 7, 2013 (ADAMS Accession No. ML131640201). SCE subsequently submitted two letters to the NRC, dated July 22, 2013 (ADAMS Accession No. ML13204A304), and June 28, 2013 (ADAMS Accession No. ML13183A391), certifying the permanent removal of fuel from the reactor vessels of Units 2 and 3, respectively.

The NRC staff notes that as approved by exemption dated September 5, 2014, (ADAMS Accession No. ML14101A132), SCE uses the nuclear decommissioning trust fund (DTF) for license termination, irradiated fuel management and site restoration expenditures. While costs associated with all of these activities are discussed in the IFMP, this review focuses specifically on the costs associated with the management of irradiated fuel. A separate review of the PSDAR and site-specific DCE is currently being performed by the NRC staff.

3.0 REGULATORY EVALUATION

3.1 Regulatory Requirements

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(bb) states, in part:

For nuclear power reactors licensed by the NRC, the licensee shall, within 2 years following permanent cessation of operation ... submit written notification to the Commission for its review and preliminary approval of the program by which the licensee intends to manage and provide funding for the management of all irradiated fuel at the reactor following permanent cessation of the operation

of the reactor until title to the irradiated fuel and possession of the fuel is transferred to the Secretary of Energy for its ultimate disposal in a repository.

Section 50.54(bb) of 10 CFR further states:

The licensee must demonstrate to NRC that the elected actions will be consistent with NRC requirements for licensed possession of irradiated nuclear fuel and that the actions will be implemented on a timely basis. Where implementation of such actions requires NRC authorizations, the licensee shall verify in the notification that submittals for such actions have been or will be made to NRC and shall identify them. A copy of the notification shall be retained by the licensee as a record until expiration of the reactor operating license. The licensee shall notify the NRC of any significant changes in the proposed waste management program as described in the initial notification.

In addition, 10 CFR 50.82(a)(4)(i) states, in part, that the site-specific DCE that is submitted as part of the PSDAR includes the projected costs of managing irradiated fuel.

3.2 Information Submitted in Support of the IFMP Review

Similar to reviews of other IFMPs,¹ the NRC staff reviewed the following information submitted in support of the SONGS IFMP:

- Estimated cost to isolate the spent fuel pool (SFP) and fuel handling systems. For the decontamination (DECON) option, the cost to isolate the SFP and fuel handling systems may be considered as part of the preparation for DECON;
- Estimated cost to construct an ISFSI or a combination of wet/dry storage;
- Estimated annual cost for the operation of the selected option (wet or dry storage or a combination of the two) until the Department of Energy (DOE) takes possession of the fuel;
- Estimated cost for the preparation, packaging, and shipping of the fuel to DOE;
- Estimated cost to decommission the spent fuel storage facility; and
- Brief discussion of the selected storage method or methods, and the estimated time for these activities.

In addition, the NRC has determined that irradiated fuel can be safely stored in spent fuel pools and ISFSIs. The technical feasibility of either storage method was codified in the Continued Storage of Spent Nuclear Fuel Rule (79 FR 56238), as supported by NUREG-2157, "Generic Environmental Impact Statement for Continued Storage of Spent Nuclear Fuel" (ADAMS Accession No. ML14196A105), and specifically, Appendix B, "Technical Feasibility of Continued Storage and Repository Availability." With regard to "actions implemented on a timely basis," NUREG-2157 considers three time periods: short-term storage, long-term storage, and indefinite storage. While all storage timeframes are considered technically feasible, the short-term storage period of 60 years beyond licensed life for reactor operations covers the IFMP

¹ Most recently, the safety evaluation by the Office of Nuclear Reactor Regulation related to the updated IFMP of Duke Energy Florida, Inc., Crystal River Unit 3 Nuclear Generating Plant, Docket No. 50-302 (ADAMS Accession No. ML14344A408).

proposed by SCE. This timeframe coincides with the decommissioning timeframe. A minimum assumption is that all spent fuel will be moved from the spent fuel pool to dry cask storage by the end of the short-term storage timeframe.

4.0 TECHNICAL EVALUATION

The SONGS IFMP represents a high level plan for the management of irradiated fuel. It references the SONGS DCE as identifying the details, schedules, and costs of the spent fuel management activities. As noted above, the NRC is reviewing the SONGS DCE and PSDAR separately. However, during this review, the NRC staff considered relevant portions of the DCE and ensured consistency between the documents.

Table 1 of the IFMP identifies the seven periods of spent fuel management. For each period, the table provides a brief description, the duration, and the cost on a unit basis in 2014 dollars in the unit of thousands. The first period, "Spent Fuel Management Transition," consists of activities that support the implementation of security enhancements required for reductions in staff, cyber security modifications, post-Fukushima modifications for Unit 2, and the design and fabrication of spent fuel canisters. This period began in June 2013, ended in December 2013, and cost a total of \$129,997,000. As per the IFMP, the safe initial interim storage of SONGS irradiated fuel will occur in each unit's respective SFP (also known as "wet storage"). The normal systems that support the SFPs will be replaced by stand-alone cooling and filtration systems. These new systems will allow the SFP to independently operate from the normal systems (also known as "islanding"). Table 2 of the IFMP provides the estimated cost to isolate the SFPs and fuel handling systems, which is \$22,183,000. After appropriate cooling has occurred, all irradiated fuel in the SFPs will be transferred to the ISFSI for "dry storage." This activity is currently scheduled to be completed by 2019.

The second period, "Spent Fuel Transfer to Dry Storage," includes preparation and issuance of the IFMP; selection of the dry storage system canister design and vendor; design and construction of the ISFSI expansion (as discussed below); purchase, delivery, and loading of spent fuel canisters; and the transfer of the fuel to the ISFSI. This period began in January 2014 and is expected to end in June 2019. It is estimated to cost \$716,822,000.

Units 2 and 3 have generated a total of 3,460 irradiated fuel assemblies. At present, 792 irradiated fuel assemblies from both units have already been transferred to the ISFSI. The remaining 2,668 irradiated fuel assemblies will be loaded into DSCs and transferred to the ISFSI. The ISFSI currently contains 18 DSCs that store Unit 1 fuel and 33 DSCs that store Units 2 and 3 fuel. All of the fuel that is currently stored on the ISFSI is kept in Transnuclear NUHOMS Model Number-24PT1 or PT4 DSCs.

SCE intends to expand the current ISFSI in order to accommodate the remaining irradiated fuel from Units 2 and 3. Additional DSCs will be procured from one or more of the available, NRC-approved dry storage system suppliers, which began in 2014. An estimated 47 DSCs will be required for Unit 2 fuel, and an estimated 44 DSCs will be required for Unit 3 fuel. The exact number will depend on the capacity of the selected system and the number of DSCs needed to store GTCC waste and other materials. The estimated cost for a combination of wet/dry storage and ISFSI expansion is \$306,391,000.

The third period, "Dry Storage during Decommissioning for Units 1, 2, and 3," is scheduled for June 2019 through December 2031. The execution of scheduled activities during this period is expected to cost a total of \$122,849,000. The fourth period, "Dry Storage Only – Units 1, 2, and 3," is scheduled for December 2031 through December 2049 and is expected to cost \$58,765,000. The fifth period, "Dry Storage Only – Units 2 and 3," is scheduled for December 2049 through September 2051, and is expected to cost \$214,653,000.

The sixth period, "Decontamination and Dismantlement (D&D) Period 1," is scheduled for December 2049 through May 2050 and is expected to cost \$2,520,000. The final period, "D&D Period 2," is scheduled for May 2050 through September 2051 and is expected to cost \$30,590,000. These final two periods will serve as the time to decontaminate and dismantle the ISFSI and return the area to unrestricted use, once all spent fuel has been removed from the site.

The SONGS Units 2 and 3 IFMP is based on the commencement of industry-wide acceptance of spent fuel by DOE in 2024 and SONGS' priority-ranking in that queue. As such, SCE is assuming that all fuel will be removed from the SONGS site by 2049. The estimated cost for preparation, packing, and shipping of the fuel to DOE is \$6,742,000. The estimated cost to decommission the ISFSI is \$33,110,000.

The NRC staff, as part of its analysis of the IFMP, used the information and cost estimates outlined above, in conjunction with Tables 4A and 4B of the SONGS IFMP that provides the annual cost to manage the spent fuel, to calculate the ending balance for the SONGS DTF at the end of the projected fuel removal period. The calculation resulted in a positive ending balance: \$406,084,000 for Unit 2 and \$499,465,000 for Unit 3. The NRC staff subtracted projected radiological decontamination costs, spent fuel management costs, and site restoration costs from the projected opening balance on a yearly basis. The NRC staff then applied a 2-percent real rate of return on this value to calculate a projected year-end balance. The yearly closing balance calculations can be found in Attachment 1, "Unit 2 IFMP Closing Balance Calculations," and Attachment 2, "Unit 3 IFMP Closing Balance Calculations," of SCE's IFMP submittal.

The NRC staff finds the SONGS IFMP estimates to be reasonable, based on a cost comparison with similar decommissioning reactors, while acknowledging that there are large uncertainties and potential site-specific variances that may impact these cost estimates in the future.

Regarding the provision in 10 CFR 50.54(bb), "The licensee must demonstrate to NRC that the elected actions will be consistent with NRC requirements for licensed possession of irradiated nuclear fuel and that the actions will be implemented on a timely basis," the SONGS IFMP is consistent with the determinations that the NRC has made in the Continued Storage of Spent Nuclear Fuel Rule and NUREG-2157. The NRC staff has determined that storing fuel in either the spent fuel pool or ISFSI represents an acceptable means for storing irradiated fuel. The licensee's plan contains both storage methods, with irradiated fuel being taken out of the spent fuel pool and fully transitioned to the ISFSI within 5 years, followed by complete dry storage. The anticipated date to transfer fuel to DOE and subsequent decommissioning of the ISFSIs are scheduled to be completed in 2051. This supports the requirement to complete decommissioning within the 60-year timeframe, as required by 10 CFR 50.82.

5.0 CONCLUSION

Based on the NRC staff's review of the SONGS IFMP and site-specific DCE, the staff finds that SCE has provided sufficient detail to satisfy the requirements of 10 CFR 50.54(bb). Based on the staff's calculated positive ending balance (as provided in Attachments 1 and 2 of this safety evaluation), the NRC staff finds that SCE has demonstrated reasonable assurance that funding will be available to maintain the IFMP until the fuel is transferred to the DOE for permanent disposal. Further, the NRC staff finds that the actions and timeframes described in the IFMP are consistent with the NRC's generic determination for spent fuel management, associated with the Continued Storage of Spent Nuclear Fuel Rule, as supported by NUREG-2157. Therefore, the NRC staff preliminarily approves the SONGS IFMP.

Principal Contributor: Eric Olvera

Date: August 19, 2015

2013						\$1,847,000
2014	\$1,847,000	\$79,799	\$35,719	\$15,089	\$34,328	\$1,750,721
2015	\$1,750,721	\$69,196	\$106,308	\$7,439	\$31,356	\$1,599,133
2016	\$1,599,133	\$54,541	\$59,308	\$3,730	\$29,631	\$1,511,186
2017	\$1,511,186	\$111,903	\$59,308	\$1,957	\$26,760	\$1,364,778
2018	\$1,364,778	\$47,520	\$59,308	\$0	\$25,159	\$1,283,109
2019	\$1,283,109	\$108,328	\$27,554	\$13,539	\$22,674	\$1,156,362
2020	\$1,156,362	\$185,482	\$4,908	\$36	\$19,319	\$985,254
2021	\$985,254	\$79,081	\$4,908	\$36	\$18,025	\$919,254
2022	\$919,254	\$54,785	\$4,908	\$1,927	\$17,153	\$874,787
2023	\$874,787	\$158,207	\$4,908	\$36	\$14,233	\$725,868
2024	\$725,868	\$37,930	\$4,908	\$16,848	\$13,324	\$679,506
2025	\$679,506	\$2,922	\$4,908	\$44,621	\$12,541	\$639,596
2026	\$639,596	\$2,922	\$4,908	\$19,412	\$12,247	\$624,601
2027	\$624,601	\$2,922	\$4,908	\$22,469	\$11,886	\$606,188
2028	\$606,188	\$2,922	\$4,908	\$31,688	\$11,333	\$578,004
2029	\$578,004	\$2,922	\$4,908	\$66,873	\$10,066	\$513,367
2030	\$513,367	\$2,922	\$4,908	\$71,867	\$8,673	\$442,343
2031	\$442,343	\$2,055	\$5,089	\$23,181	\$8,240	\$420,258
2032	\$420,258	\$2,122	\$7,214	\$0	\$8,218	\$419,141
2033	\$419,141	\$0	\$7,214	\$0	\$8,239	\$420,165
2034	\$420,165	\$0	\$7,214	\$0	\$8,259	\$421,210
2035	\$421,210	\$0	\$7,228	\$0	\$8,280	\$422,262
2036	\$422,262	\$0	\$7,665	\$0	\$8,292	\$422,889
2037	\$422,889	\$0	\$7,665	\$0	\$8,304	\$423,528
2038	\$423,528	\$0	\$7,665	\$0	\$8,317	\$424,181
2039	\$424,181	\$0	\$7,665	\$0	\$8,330	\$424,846
2040	\$424,846	\$0	\$7,665	\$0	\$8,344	\$425,525
2041	\$425,525	\$0	\$7,665	\$0	\$8,357	\$426,217
2042	\$426,217	\$0	\$7,665	\$0	\$8,371	\$426,923
2043	\$426,923	\$0	\$7,665	\$0	\$8,385	\$427,643
2044	\$427,643	\$0	\$7,665	\$0	\$8,400	\$428,378
2045	\$428,378	\$0	\$7,665	\$0	\$8,414	\$429,127
2046	\$429,127	\$0	\$7,665	\$0	\$8,429	\$429,891
2047	\$429,891	\$0	\$7,665	\$0	\$8,445	\$430,671
2048	\$430,671	\$0	\$7,665	\$0	\$8,460	\$431,466
2049	\$431,466	\$0	\$7,667	\$0	\$8,476	\$432,275
2050	\$432,275	\$0	\$9,974	\$20,177	\$8,042	\$410,166
2051	\$410,166	\$0	\$6,573	\$11,928	\$7,833	\$399,498
2052	\$399,498	\$0	\$0	\$1,377	\$7,962	\$406,084
Totals		\$1,008,481	\$559,311	\$374,230		

Notes (SONGS IFMP):

Costs are in 2014 dollars (in thousands) and are not escalated from the base year.

SONGS Unit 2 Trust fund balances at end of 2013 were \$1,847,000.

Radiological Decontamination, Spent Fuel Management, and Site Restoration figures from SONGS IFMP.

2013						\$2,079,400
2014	\$2,079,400	\$78,964	\$40,156	\$15,969	\$38,886	\$1,983,197
2015	\$1,983,197	\$74,096	\$112,024	\$9,390	\$35,754	\$1,823,441
2016	\$1,823,441	\$61,451	\$64,405	\$25,227	\$33,447	\$1,705,805
2017	\$1,705,805	\$40,631	\$64,405	\$3,799	\$31,939	\$1,628,910
2018	\$1,628,910	\$86,348	\$64,405	\$0	\$29,563	\$1,507,720
2019	\$1,507,720	\$96,521	\$29,675	\$13,908	\$27,352	\$1,394,968
2020	\$1,394,968	\$120,873	\$4,908	\$2,135	\$25,341	\$1,292,393
2021	\$1,292,393	\$194,090	\$4,908	\$575	\$21,856	\$1,114,676
2022	\$1,114,676	\$135,313	\$4,908	\$2,467	\$19,440	\$991,428
2023	\$991,428	\$114,581	\$4,908	\$1,511	\$17,409	\$887,837
2024	\$887,837	\$26,874	\$4,908	\$36,778	\$16,386	\$835,662
2025	\$835,662	\$2,922	\$4,908	\$40,655	\$15,744	\$802,921
2026	\$802,921	\$2,922	\$4,908	\$21,676	\$15,468	\$788,883
2027	\$788,883	\$2,922	\$4,908	\$25,848	\$15,104	\$770,309
2028	\$770,309	\$2,922	\$4,908	\$20,945	\$14,831	\$756,365
2029	\$756,365	\$2,922	\$4,908	\$117,321	\$12,624	\$643,838
2030	\$643,838	\$2,922	\$4,908	\$116,672	\$10,387	\$529,723
2031	\$529,723	\$2,055	\$5,089	\$25,501	\$9,942	\$507,019
2032	\$507,019	\$2,122	\$7,214	\$0	\$9,954	\$507,637
2033	\$507,637	\$0	\$7,214	\$0	\$10,008	\$510,432
2034	\$510,432	\$0	\$7,214	\$0	\$10,064	\$513,282
2035	\$513,282	\$0	\$7,228	\$0	\$10,121	\$516,175
2036	\$516,175	\$0	\$7,665	\$0	\$10,170	\$518,680
2037	\$518,680	\$0	\$7,665	\$0	\$10,220	\$521,236
2038	\$521,236	\$0	\$7,665	\$0	\$10,271	\$523,842
2039	\$523,842	\$0	\$7,665	\$0	\$10,324	\$526,500
2040	\$526,500	\$0	\$7,665	\$0	\$10,377	\$529,212
2041	\$529,212	\$0	\$7,665	\$0	\$10,431	\$531,978
2042	\$531,978	\$0	\$7,665	\$0	\$10,486	\$534,799
2043	\$534,799	\$0	\$7,665	\$0	\$10,543	\$537,677
2044	\$537,677	\$0	\$7,665	\$0	\$10,600	\$540,612
2045	\$540,612	\$0	\$7,665	\$0	\$10,659	\$543,606
2046	\$543,606	\$0	\$7,665	\$0	\$10,719	\$546,660
2047	\$546,660	\$0	\$7,665	\$0	\$10,780	\$549,775
2048	\$549,775	\$0	\$7,665	\$0	\$10,842	\$552,952
2049	\$552,952	\$0	\$7,667	\$0	\$10,906	\$556,191
2050	\$556,191	\$0	\$9,974	\$23,120	\$10,462	\$533,559
2051	\$533,559	\$0	\$6,573	\$45,566	\$9,628	\$491,048
2052	\$491,048	\$0	\$0	\$1,377	\$9,793	\$499,465
Totals		\$1,051,451	\$586,876	\$550,440		

Notes (SONGS IFMP):

Costs are in 2014 dollars (in thousands) and are not escalated from the base year.

SONGS Unit 3 Trust fund balances at end of 2013 were \$2,079,400.

Radiological Decontamination, Spent Fuel Management, and Site Restoration figures from SONGS IFMP.

The NRC staff recognizes that the IFMP analysis is based on a reported DTF balance that may fluctuate over time. Should a material decline in the DTF balance occur, the staff's analysis and findings may be impacted. However, in accordance with 10 CFR 50.82(a)(8)(vii), the licensee must annually submit to the NRC, by March 31, a report on the status of its funding for managing irradiated fuel. Further, in accordance with 10 CFR 50.54(bb), the licensee shall notify the NRC of any significant changes to the IFMP. Accordingly, the regulations provide a means of informing the NRC staff of fluctuations in the reported DTF balance and significant changes to the IFMP.

If you have any questions, please contact me at 301-415-4037 or Thomas.Wengert@nrc.gov.

Sincerely,

/RA/

Thomas J. Wengert, Senior Project Manager
 Plant Licensing IV-2 and Decommissioning
 Transition Branch
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure:
 Safety Evaluation

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