

U.S. NUCLEAR REGULATORY COMMISSION

DIRECTIVE TRANSMITTAL

TN: DT-07-12

To: All NRC Employees

Subject: Transmittal of Management Directive 7.6, "Public and Confidential Financial Disclosure Reports"

Purpose: Directive and Handbook 7.6 are being revised to update the exhibit to the handbook which is a list of employee positions meeting the criteria for filing a confidential financial disclosure report.

Office of Origin: Office of the General Counsel

Contact: John Szabo, 301-415-1610

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Volume: 7 Legal and Ethical Guidelines

Directive 7.6 Public and Confidential Financial Disclosure Reports

Availability: Rulemaking, Directives, and Editing Branch
Office of Administration
Michael T. Lesar, 301-415-7163
Christy Moore, 301-415-7086

Public and Confidential Financial Disclosure Reports

Directive
7.6

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U. S. Nuclear Regulatory Commission

Volume: 7 Legal and Ethical Guidelines

OGC

Public and Confidential Financial Disclosure Reports Directive 7.6

Policy (7.6-01)

It is the policy of the U.S. Nuclear Regulatory Commission to inform employees of the laws and regulations on financial disclosure and to resolve conflicts of interest that appear on financial disclosure reports.

Objectives (7.6-02)

- To assist individuals who are required to file financial disclosure reports comply with the filing requirements. (021)
- To describe the procedures of NRC for identifying filers and for distributing, collecting, reviewing, and maintaining custody of financial disclosure reports. (022)
- To describe procedures when remedial, administrative, or disciplinary actions are necessary because of conflicts of interest. (023)

Organizational Responsibilities and Delegations of Authority (7.6-03)

Chief Financial Officer (CFO) (031)

Collects necessary fee for late filing of a public financial disclosure report.

Organizational Responsibilities and
Delegations of Authority
(7.6-03) (continued)

General Counsel (GC)
(032)

- Serves as the NRC Designated Agency Ethics Official (DAEO) and counselor with overall administrative responsibility for the agency's ethics program. (a)
- Ensures compliance with the financial disclosure requirements contained in the Ethics in Government Act of 1978, as amended, Executive Order (E.O.) 12674 (as modified by E.O. 12731), and the Office of Government Ethics (OGE) regulations contained in 5 CFR Part 2634. (b)
- After consultation with the appropriate office director or regional administrator, and any required EDO approval, updates, as needed, the list of positions subject to the financial disclosure criteria (see the exhibit of Handbook 7.6) and may add or delete positions on that list based on a determination whether the position meets the filing criteria specified in OGE regulations. (c)
- Designates an Alternate DAEO and OGC attorneys in the Division of Legal Counsel, Legislation, and Special Projects as deputy counselors regarding ethical matters. (d)
- Makes referrals to the Inspector General of allegations of violations regarding compliance with the financial disclosure requirements. (e)

Inspector General (IG)
(033)

Investigates allegations of failure to comply with laws or regulations on financial disclosure and makes appropriate referrals for action.

Organizational Responsibilities and
Delegations of Authority
(7.6-03) (continued)

Executive Director for Operations (EDO)
(034)

Approves recommendations from office directors reporting to the EDO, and regional administrators, after OGC consultation, for changes to the list of positions subject to the financial disclosure criteria (see the exhibit of Handbook 7.6).

Director, Office of Human Resources (HR)
(035)

- Ensures that a master list of individuals employed by NRC who are required to file a public financial disclosure report (Standard Form [SF] 278, "Executive Branch Personnel Public Financial Disclosure Report," which may be accessed through the online forms icon) is maintained and updated annually. (a)
- Identifies positions requiring new entrants, incumbents, or employees terminating service to file an SF 278 and provides new entrants and terminating employees with that form. (b)
- Provides new entrants and individuals promoted or converted to a position covered by the confidential financial reporting requirement with an "Executive Branch Confidential Financial Disclosure Report," OGE Form 450 (which may be accessed through the online forms icon). (c)

Office Directors and
Regional Administrators
(036)

- Identify positions at the level of GG-15 or below that are subject to the confidential financial reporting requirement. (a)

Organizational Responsibilities and
Delegations of Authority
(7.6-03) (continued)

Office Directors and
Regional Administrators
(036) (continued)

- Provide employees at the level of GG-15 or below whose positions are listed on the exhibit of Handbook 7.6 with OGE Forms 450 and 450-A each year. Provide special Government employees with the appropriate financial disclosure forms before initial appointment and on reappointment. (b)

Deputy Counselors
(037)

Deputy counselors are attorneys in the Division of Legal Counsel, Legislation, and Special Projects, OGC, who—

- Provide incumbent public financial report filers with an SF 278. (a)
- Direct paralegal specialists to distribute, collect, log in, and perform the initial review of forms. (b)
- Review and sign financial disclosure reports as authorized by the General Counsel. (c)
- Determine whether the financial interests disclosed in the reports could raise conflict-of-interest considerations. (d)
- Inform employees and their supervisors of any possible concerns regarding ethical matters that appear on their financial disclosure report and assist employees in resolving these concerns. (e)

Organizational Responsibilities and
Delegations of Authority
(7.6-03) (continued)

Regional Counsels
(038)

Advise employees in their respective regions on matters relating to financial disclosure, under the direction of deputy counselors.

Applicability
(7.6-04)

This directive and handbook apply to all NRC employees and special Government employees who are required to file financial disclosure reports.

Conflict of Interest
(7.6-05)

All employees, even those who are not required to file a financial disclosure report, should always be aware that they are subject to the laws and regulations on employee conduct, such as the Governmentwide standards of conduct regulations and the criminal conflict-of-interest laws. Employees should consult a deputy counselor on any question relating to the ethics laws or regulations and should advise their supervisor or a deputy counselor before participating in any NRC particular matter that could create a conflict of interest or an appearance of a conflict of interest.

Prohibited Financial Conflict
of Interest
(051)

All employees, including those who do not file financial disclosure reports, are prohibited by criminal law from participating personally and substantially in an official capacity in any NRC particular

Conflict of Interest
(7.6-05) (continued)

Prohibited Financial Conflict
of Interest
(051) (continued)

matter (including rulemaking) that could directly and predictably affect their financial interests unless they receive a written waiver or the financial interest is exempt under 5 CFR Part 2640 as too remote or inconsequential. This prohibition extends to the financial interests of any of the following:

- Their spouse or minor child (a)
- Their general partner (b)
- An organization in which the employee serves as an officer, a director, a trustee, a general partner, or an employee (c)
- An organization with which the employee is negotiating or has an arrangement for prospective employment (d)

Appearance of Conflict of Interest
(052)

All employees, including those who do not file financial disclosure reports, are prohibited from participating in any NRC particular matter involving specific parties when they know that matter is likely to have a direct and predictable effect on the financial interests of a member of their household if a reasonable person would question their impartiality, unless they receive a written waiver. This ban also extends to anyone with whom the employee has a covered relationship, which includes—

- Anyone with whom the employee has a business, contractual, or other financial relationship (a)

Conflict of Interest

(7.6-05) (continued)

Appearance of Conflict of Interest

(052) (continued)

- A relative with whom the employee has a close personal relationship (b)
- Anyone the employee served during the past year as officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee (c)

Waivers

(053)

Employees who have a conflict of interest arising from a financial interest or an appearance of a conflict of interest must disqualify themselves from participation in the NRC particular matter in which they have a conflict of interest unless that financial interest is divested or they obtain a written waiver authorizing their participation from a designated official under the policies and procedures in Management Directive 7.9, "Ethics Approvals and Waivers."

Definitions

(7.6-06)

Employee. An NRC employee, a special Government employee, or an employee of another Government agency assigned or detailed to NRC for more than 30 days.

Special Government Employee. An NRC employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or an intermittent basis, with or without compensation, for a period not to exceed 130 days during any period of 365 consecutive days. The term includes NRC consultants, experts, and members of advisory committees but does not include members of the uniformed services.

Handbook
(7.6-07)

Handbook 7.6 provides guidance for determining which employees must file financial disclosure reports as well as the procedures for filing, tracking, reviewing, amending, and maintaining custody of financial disclosure reports and for resolving conflicts of interests arising from information disclosed on the reports.

References
(7.6-08)

Code of Federal Regulations—

5 CFR Part 2634, “Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture.”

5 CFR Part 2635, “Standards of Ethical Conduct for Employees of the Executive Branch.”

5 CFR Part 2640, “Interpretation, Exemptions, and Waiver Guidance Concerning 18 U.S.C. 208 (Acts Affecting a Personal Financial Interest).”

Executive Order (E.O.) 12674, “Principles of Ethical Conduct for Government Officers and Employees,” April 12, 1989, as modified by E.O. 12731, “Principles of Ethical Conduct for Government Officers and Employees,” October 17, 1990.

NRC Management Directive 7.9, “Ethics Approvals and Waivers.”

United States Code

“Acts Affecting a Personal Financial Interest” (18 U.S.C. 208).

Ethics in Government Act of 1978, as amended (5 U.S.C. App., Section 101 et seq.).

Freedom of Information Act of 1966 (5 U.S.C. 552).

Inspector General Act of 1978 (5 U.S.C. App. 3).

Privacy Act of 1974, as amended (5 U.S.C. 552a).

Public and Confidential Financial Disclosure Reports

Handbook

7.6

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Part I

Filers of Financial Disclosure Reports

Identifying Filers of Public Financial Disclosure Reports (A)

The following NRC employees who work for more than 60 days during a 365-day period must file a Standard Form (SF) 278, "Executive Branch Personnel Public Financial Disclosure Report" (which may be accessed through the online forms icon): NRC Commissioners, the Inspector General, Commissioner assistants (except for those who do not contribute to the Commission's decisionmaking process), members of the Senior Executive Service or the Senior Level System, full-time Administrative Judges, and special Government employees paid at a rate above GG-15 who serve more than 60 days during a 365-day period. (1)

The three categories of public report filers are new entrants, incumbents, and termination filers. The procedures for identifying filers follow. (2)

- **New entrants.** Except for special Government employees, the Office of Human Resources (HR) identifies those individuals who will assume a position that requires the filing of a public financial disclosure report and informs an OGC deputy counselor. For special Government employees paid at a rate above GG-15, the employing office determines whether the individual will work more than 60 days in the next 365 days and informs an OGC deputy counselor. (a)
- **Incumbents.** Each March, an OGC deputy counselor will request from HR a list of all employees who are required to fill out an SF 278. HR is responsible for identifying, maintaining, and updating master lists of SF 278 filers, including special Government employees. (b)

Identifying Filers of Public Financial Disclosure Reports (A) (continued)

- **Termination filers.** HR will identify appropriate individuals who must file an SF 278 within 30 days after terminating service and will inform an OGC deputy counselor. (c)

Identifying Filers of Confidential Financial Disclosure Reports (B)

Regular Employees (1)

Employees at the GG-15 level or below must file a confidential financial disclosure report (Office of Government Ethics [OGE] Form 450, "Executive Branch Confidential Financial Disclosure Report," or 450-A, "Confidential Certificate of No New Interests (Executive Branch)," which may be accessed through the online forms icon) if they participate personally and substantially, through decision or the exercise of significant judgment in— (a)

- contracting or procurement; (i)
- administering or monitoring grants, subsidies, licenses, or other Federally conferred financial or operational benefits; (ii)
- regulating or auditing any non-Federal entity; or (iii)
- other activities in which the final decision or action will have a direct and substantial economic effect on the interests of any non-Federal entity. (iv)

However, employees who meet any of the criteria for filing a confidential financial disclosure report may be excluded from filing the report if there is a substantial degree of supervision or only a remote possibility of a real or apparent conflict of interest. (b)

Identifying Filers of Confidential Financial Disclosure Reports (B) (continued)

Office directors and regional administrators or their designees will determine which positions in their office or region meet any of the criteria for filing a confidential financial disclosure report and which of those positions should be excluded from the reporting requirement. The Executive Director for Operations (EDO) will review and approve these determinations for offices reporting to the EDO and the regions, after consultation with OGC. A list of employee positions that meet the criteria for filing a confidential financial disclosure report is attached as an exhibit to this handbook. (c)

Special Government Employees (2)

All special Government employees must file an OGE Form 450 if they are paid at the rate of GG-15 or below or are paid above the GG-15 rate but work 60 days or less during a 365-day period. Special Government employees cannot file the alternative OGE Form 450-A.

Part II

Administration of Financial Disclosure Reports

Distributing Blank Forms (A)

New Entrants (1)

Regular employees. The Office of Human Resources (HR) will provide a public financial disclosure report (Standard Form [SF] 278, which also may be accessed through the online forms icon) to an individual when that person is either hired, promoted, or converted to a position paid at a rate greater than GG-15, except for a special Government employee. HR will notify an Office of the General Counsel (OGC) deputy counselor of this action. (a)

Confidential reports. HR will provide an Office of Government Ethics (OGE) Form 450 (which also may be accessed through the online forms icon) to an individual when that person is either hired, promoted, or converted to a position at grade GG-15 or below that is included in the list of the exhibit of this handbook, except for a special Government employee. HR will notify an OGC deputy counselor of this action. Employees required to file a confidential financial disclosure report as a new entrant cannot file the alternative OGE Form 450-A. (b)

Special Government employees. An office intending to employ a special Government employee will provide that individual with either an SF 278 or an OGE Form 450, as appropriate (but not the alternative OGE Form 450-A), and will notify HR and an OGC deputy counselor of this action. (c)

Annual Filers (2)

Public reports. By March 15th of each year, OGC will notify all employees and special Government employees required to file an annual public financial disclosure report of this requirement and

Distributing Blank Forms (A) (continued)

Annual Filers (2) (continued)

that they may electronically fill out and save their SF 278s through the online forms icon. However, these employees must submit to OGC a paper copy of their report that has their actual signature. (a)

Confidential reports (regular employees). In September of each year, OGC will send office directors and regional administrators the names of employees in their respective offices who may hold a position listed in the exhibit of this handbook. Office directors and regional administrators will update the list and direct those employees to fill out OGE Form 450 or 450-A. These employees may fill out the form electronically but must submit a paper copy of their form to OGC with their actual signature. (b)

Confidential reports (special Government employees). HR or the office employing a special Government employee required to file a confidential financial disclosure report will notify that individual to fill out an OGE Form 450 (which may be accessed through the online forms icon) annually or upon renewal for an additional year. The office will also notify HR and an OGC deputy counselor of this action. (c)

Termination Filers (3)

HR will provide a public financial disclosure form (SF 278) to an employee required to file a public financial disclosure report before termination and will notify an OGC deputy counselor of this action. Employees required to file a confidential financial disclosure report are not required to file a report when they terminate service.

Filing Instructions (B)

Accessing Forms Electronically (1)

Employees may electronically fill out and save their SF 278s or OGE Form 450 or 450-A. However, they must submit to OGC a paper copy of their report with their signature.

Filing Instructions (B) (continued)

New Entrants (2)

Individuals assuming a position that requires the filing of a public or a confidential financial disclosure report must file the appropriate form completed within 30 days after commencement of employment or the effective date of their promotion or conversion unless they have been granted an extension by an OGC deputy counselor. The filer should send the completed report in a sealed envelope to the OGC employee designated in the filing instructions that accompany the blank form. (a)

A new employee required to file a confidential financial disclosure report must file the OGE Form 450 and not the alternative OGE Form 450-A. (b)

All special Government employees must file a public or confidential financial disclosure report (but not the OGE Form 450-A) within 30 days of the date of their appointment or the effective date of their promotion or conversion unless they have been granted an extension by an OGC deputy counselor. It is NRC policy that special Government employees file their completed report before the date they actually commence service. (c)

Annual Filers (3)

Public Filers (a)

Public filers must file an SF 278 with OGC by May 15 of each year unless they have been granted an extension by an OGC deputy counselor. Completed public reports should be sent in a sealed envelope to the designated OGC employee.

Confidential Filers (b)

Regular Employees (i)

Regular employees must file either an OGE Form 450 or 450-A by October 31 of each year, unless they have been granted an

Filing Instructions (B) (continued)

Annual Filers (3) (continued)

extension by an OGC deputy counselor. Employees should send their completed confidential reports in a sealed envelope to the designated OGC employee. (a)

The OGE Form 450-A is a certification that the employee has not acquired any new reportable interests or changed positions or duties since the filing of the employee's most recent OGE Form 450. Regular employees must file the OGE Form 450 if they have new interests to report or if they have changed jobs or had a significant change in their duties since their last filing. Regular employees may file an OGE Form 450-A for a maximum of 3 consecutive years before they are required to complete a new OGE Form 450 every fourth year. (b)

Special Government Employees (ii)

Special Government employees who do not file a public financial disclosure report must file an OGE Form 450 annually by October 31 of each year or within 30 days after the date of their renewal if they are appointed for not more than a year. Completed confidential financial disclosure reports should be sent in a sealed envelope to the designated OGC employee. Special Government employees are prohibited from filing the alternative OGE Form 450-A.

Termination Filers (4)

Employees terminating a position that requires the filing of a public financial disclosure report (SF 278) must file an SF 278 within 30 days after leaving that position unless they transfer to another position that requires the filing of a public report or were granted an extension by an OGC deputy counselor. Employees required to file a confidential financial disclosure report are not required to file a report upon termination of their position.

Filing Instructions (B) (continued)

Late Filing Fee (5)

Individuals required to file a public financial disclosure report (SF 278) are subject to a filing fee of \$200 if they file their report more than 30 days after the last day the report is required to be filed. If they have received an extension of time to file their report, they are subject to this fee if their report is filed more than 30 days after the last day of the extension period. (a)

Employees may request a waiver of the late filing fee from an OGC deputy counselor in writing with supporting documentation. An OGC deputy counselor may waive the late filing fee upon a determination, in writing, that the delay in filing was caused by extraordinary circumstances, including NRC's failure to notify a new entrant, a first-time annual filer, or a termination filer of the requirement to file the public financial disclosure report, which made the delay reasonably necessary. A copy of the OGC deputy counselor's determination must be placed in the employee's public financial disclosure report file. The OGC deputy counselor may consult with the Office of Government Ethics before approving any waiver of the late filing fee. (b)

Assistance With Forms (C)

Any questions concerning filling out or submitting any financial disclosure form should be directed to an OGC deputy counselor, a regional counsel, or other designated OGC employees.

Extensions (D)

On request, an OGC deputy counsel can grant, for good cause, any filer or class of filers of the public SF 278 an extension of up to 45 days to file the form. An OGC deputy counselor can grant an additional extension of up to 45 days for good cause. However, the filer must specify in writing the reasons why an additional extension is necessary, and the OGC deputy counselor must approve or deny the request in writing. Documents relating to

Extensions (D) (continued)

these requests shall be placed in the requestor's public financial disclosure file. (1)

On request, an OGC deputy counsel can grant any filer or class of filers of the confidential OGE Form 450 or 450-A a filing extension not to exceed 90 days. (2)

Exemptions From Filing (E)

Commissioners' support staff who do not contribute substantively to the policymaking process are not required to file public reports unless the position has not been previously exempted by OGE. To obtain an exemption, an OGC deputy counselor provides OGE with the position description of any new position with a declaration that the incumbent does not furnish input into the Commission's decisionmaking process. (1)

An OGC deputy counselor also may request an exemption from OGE that would permit the agency to withhold from the public copies of the SF 278 filed by special Government employees who work for NRC less than 130 days per calendar year. (2)

Authorized Reviewers (F)

Both public and confidential reports may be reviewed only by the General Counsel, the Alternate NRC Designated Agency Ethics Official (DAEO), deputy counselors, or paralegal specialists designated by the General Counsel. Public financial disclosure forms and confidential disclosure forms filled out by special Government employees may be signed only by the General Counsel, the Alternate DAEO, or deputy counselors. The General Counsel signs the forms submitted by all Presidential appointees. The Chairman signs the form submitted by the General Counsel. (1)

Confidential financial disclosure reports, except for those filed by special Government employees, may be signed by designated

Authorized Reviewers (F) (continued)

paralegal specialists when the interests reported will not create the potential for a conflict of interest. Confidential financial disclosure reports that reveal financial interests that could pose a conflict of interest must be signed by a deputy counselor. (2)

Review of Forms (G)

Public Form (SF 278) (1)

A designated OGC paralegal specialist or staff member logs in each completed SF 278 and sends the employee a receipt. Each form is initially reviewed by a paralegal specialist who ensures that the form is complete. The paralegal specialist will contact the filer to acquire any necessary additional information before giving the form to a deputy counselor for review. (a)

After signature, the form and any appropriate materials are placed in the filer's individual file. (b)

Confidential Forms (OGE Forms 450 and 450-A) (2)

A designated OGC paralegal specialist or staff member logs in each confidential form. The paralegal specialist reviews the form to ensure completeness, contacts the filer to acquire any necessary additional information, and signs each form if no conflicts or potential conflicts of interest are found (except for forms filed by special Government employees, which must be signed by a deputy counselor). (a)

An OGC deputy counselor sends a memorandum identifying any conflict of interest or potential conflict of interest found on the report of a new entrant to the filer, with a copy to the filer's office director, regional administrator, or supervisor indicating how the conflict should be resolved. OGC deputy counselors will send such memoranda to other filers upon request or upon disclosure of reported conflicts of interest. (b)

Timetable and Procedures for Obtaining Clarifications, Addenda, and Errata (H)

An OGC deputy counselor or designated paralegal specialist will review each report within 60 days after filing. Clarifications, addenda, and errata may be obtained by telephone or electronic mail. If this method is not practical, the form will be returned to the filer with written instructions specifying what is needed to remedy the deficiency.

Amending Reports (I)

The OGC reviewer will mark, initial, and date amended information communicated by the employee directly on the form. If the reviewer returns the report to the filer, the filer will make the necessary changes.

Maintaining Custody of Reports (J)

OGC maintains custody of all reports in locked file cabinets.

Public Access to Executive Branch Personnel Public Financial Disclosure Reports (SF 278s) (K)

An SF 278 filed by an NRC employee is available to the public from OGC upon request. Anyone wishing to view an SF 278 must submit to OGC an OGE Form 201, "Request to Inspect or Receive Copies of SF 278 or Other Covered Record," that states the legal restrictions on the use of the report.

Security for Confidential Financial Disclosure Reports (OGE Forms 450 and 450-A) (L)

As required by the Ethics in Government Act, the information contained in a confidential financial disclosure report filed by an NRC employee will not be disclosed to the public and is exempt from release under the Freedom of Information Act.

Pursuing Administrative or Disciplinary Action (M)

If an employee fails to file a financial disclosure report, refuses to provide necessary information, or provides false or incomplete information, the General Counsel or designee will refer the matter to the Inspector General (IG). The IG will examine the matter, make any necessary referrals to the Department of Justice, and, when appropriate, report its findings to agency management for appropriate disciplinary action.

Remedial Actions To Resolve Conflicts of Interest or Violations of Law, Regulations, or Executive Orders (N)

The General Counsel or designee will refer violations of law, regulations, or Executive Orders to the IG. As appropriate, an OGC deputy counselor will advise the filer, the office director, the regional administrator, or the supervisor of an appropriate action to resolve a conflict of interest disclosed on a financial disclosure report, such as divestiture, recusal from particular matters, or obtaining a waiver pursuant to Management Directive 7.9, "Ethics Approvals and Waivers."

Following Up On Delinquent Reports (O)

An OGC deputy counselor will contact delinquent filers of public or confidential financial disclosure reports. If necessary, an OGC deputy counselor also will contact office directors and regional administrators concerning delinquent employees in their office or region.

Procedures for Collecting or
Waiving the Late Filing Fee
for Public Financial Disclosure
Reports (P)

The General Counsel or designee will notify the Office of the Chief Financial Officer to take the necessary steps to collect the \$200 fee, which is imposed by the Ethics in Government Act for late filing of a public financial disclosure report. In extraordinary circumstances, OGE may waive this late filing fee. Employees seeking a waiver must provide the necessary information supporting the request in writing to the General Counsel or designee for submission to OGE.

Exhibit

NRC Positions That Meet Filing Criteria

I. Positions Meeting Criteria for Filing a Public Financial Disclosure Report (SF 278)

The Commissioners (A)

The Inspector General (B)

Members of the Senior Executive Service (C)

Senior Level Service (SLS) Employees (D)

Full-Time Administrative Judges (Legal or Technical) (E)

Commissioner Assistants (excluding support positions) (F)

Special Government Employees paid at the rate above GG-15 who work more than 60 days during a 365-day period (G)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A)

Special Government Employees Not Required to File a Public Financial Disclosure Report (A)

Commission-Level Offices (B)

Advisory Committee on Reactor Safeguards (ACRS)/Advisory Committee on Nuclear Waste (ACNW) (1)

- Branch Chiefs
- Director, Program Management and Data Analysis (PMDA)

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Commission-Level Offices (B) (continued)

Atomic Safety and Licensing Board Panel (ASLBP) (2)

Director, Program Support and Analysis Staff

Office of Commission Appellate Adjudication (OCAA) (3)

Attorneys

Office of Congressional Affairs (OCA) (4)

None

Office of the General Counsel (OGC) (5)

Attorneys at GG 14-15

Office of International Programs (OIP) (6)

- Non-SES Supervisors
- Senior International Relations Officer
- Senior Project Manager

Office of Public Affairs (OPA) (7)

- Deputy Director
- Assistant to the Director

Office of the Secretary of the Commission (SECY) (8)

Policy Coordinator

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Commission-Level Offices (B) (continued)

Office of the Inspector General (OIG) (9)

- Auditors at GG-15
- Investigators in Occupational Code 1811
- Director, Resource Management and Operations Support (RMOS)
- Personnel Officer
- Senior Budget Analyst
- IT Specialist
- General Engineer

Office of the Chief Financial Officer (OCFO) (10)

- Senior License Fee Policy Analyst
- Chief, License Fee Team
- Chief, Accounts Receivable Team
- Deputy Director, Division of Planning, Budget, and Analysis
- Deputy Director, Division of Financial Services
- Deputy Director, Division of Financial Management

Offices That Report to the Executive Director for Operations (C)

Office of the Executive Director for Operations (EDO) (1)

Section Chiefs

Office of Administration (ADM) (2)

- Non-SES Supervisors
- Criminal History Program Manager
- Chief, Administrative Services Center
(Property Management Officer)

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Offices That Report to the Executive Director for Operations (C) (continued)

- Program Analyst (Allowance Financial Manager)
- Fiduciary Project Officer with responsibility over \$500,000
- Property Management Team Leader
- Warranted Contracting Officers

Office of Information Services (OIS) (3)

- Non-SES Supervisors
- Team Leaders
- Project Managers with fiduciary responsibility over \$500,000

Office of Enforcement (OE) (4)

- Non-SES Supervisors
- Team Leaders
- Enforcement Specialists and Advisors
- Allegations Specialists
- Special Assistant

Office of Federal and State Materials and Environmental Management Programs (FSME) (5)

- Non-SES Supervisors
- Team Leaders
- Senior Program Managers
- Inspectors, as defined in NRC Inspection Manual Chapter 12.46
- Technical positions with signature authority for licenses and certificates of registration

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Offices That Report to the Executive Director for Operations (C) (continued)

Office of Human Resources (HR) (6)

- GG-15 Positions
- Financial and Administrative Resources Manager
- Project Officers

Office of Investigations (OI) (7)

- Field Office Directors
- Investigators

Office of Small Business and Civil Rights (SBCR) (8)

None

Office of New Reactors (NRO) (9)

Non-SES Supervisors

Office of Nuclear Material Safety and Safeguards (NMSS) (10)

- Non-SES Supervisors
- Team Leaders
- Inspectors, as defined in NRC Inspection Manual 12.46

Office of Nuclear Reactor Regulation (NRR) (11)

- Non-SES Supervisors
- Allegation Coordinators
- Fiduciary Project Managers with responsibility for more than \$250,000

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Offices That Report to the Executive Director for Operations (C) (continued)

Office of Nuclear Regulatory Research (RES) (12)

Non-SES Supervisors

Office of Nuclear Security and Incident Response (NSIR) (13)

- Non-SES Supervisors
- Material Control and Accounting (MC&A) Inspectors
- Fiduciary Project Managers with responsibility for more than \$250,000
- Team Leaders

Regions (14)

Office of the Regional Administrator (ORA) (a)

- Regional Counsel
- Senior Allegation Coordinator
- Chief, Response Coordination Branch
- Enforcement Officer
- Technical Program Staff Team Leader
- Technical Assistant
- Enforcement/Investigations Officer
- Allegation/Enforcement Staff Team Leader

Division of Reactor Projects (DRP) (b)

- Branch Chiefs
- Senior Resident Inspectors
- Senior Reactor Engineer Team Leader
- Senior Project Engineer
- Technical Support Staff Team Leader
- Technical Assistant

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Offices That Report to the Executive Director for Operations (C) (continued)

Division of Reactor Safety (DRS) (c)

- Branch Chiefs
- Team Leaders (GG-15)
- Senior Reactor Analyst
- Senior Technical Analyst
- Senior Project Manager

Division of Nuclear Materials Safety (DNMS) (d)

- Deputy Director
- Branch Chiefs
- Senior Management Analyst
- Senior Materials Analyst
- Senior Resident Inspectors
- Senior Site Representative
- Senior Resident Project Inspector
- Technical Assistant

Division of Resource Management and Administration (DRMA) (e)

- Director
- Deputy Director
- Branch Chief, Resource Management
- Budget/Management Analyst for Contracts, Procurement, and Travel
- Purchasing Agent
- Procurement Agent
- Branch Chief, Financial Resources
- Branch Chief, Information Resources

Exhibit (continued)

II. Positions Meeting Criteria for Filing a Confidential Financial Disclosure Report (OGE Form 450 or 450-A) (continued)

Offices That Report to the Executive Director for Operations (C) (continued)

- Branch Chief, Financial Resource Management
- Branch Chief, Information Resource Management
- Budget Analyst