

August 3, 2012

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)	
)	
)	
LUMINANT GENERATION CO. LLC)	Docket Nos. 52-034 & 52-035
)	
)	
(Comanche Peak Nuclear Power Plant,)	
Units 3 & 4))	

NRC STAFF'S ANSWER TO MOTION FOR LEAVE TO FILE A NEW CONTENTION
CONCERNING TEMPORARY STORAGE AND ULTIMATE DISPOSAL OF NUCLEAR WASTE
AT COMANCHE PEAK NUCLEAR POWER PLANT

INTRODUCTION

Pursuant to 10 C.F.R. § 2.309(h)(1), the staff of the U.S. Nuclear Regulatory Commission ("Staff") files its answer to the "Intervenors' Motion for Leave to File a New Contention Concerning Temporary Storage and Ultimate Disposal of Nuclear Waste at Comanche Peak Nuclear Power Plant" (July 9, 2012) (Agencywide Documents Access and Management System ("ADAMS") Accession No. ML12191A384) ("Petition"). The Petition raises a new contention based on the D.C. Circuit Court of Appeal's June 8, 2012 opinion in *New York v. NRC*, 681 F.3d 471 (D.C. Cir. 2012). As explained below, the new contention would be admissible if the Commission rules on it after the D.C. Circuit issues the mandate for that decision. But, if the Commission rules before the issuance of the mandate, then the Commission's existing regulations bar admission of the contention, and the Commission should dismiss it without prejudice to timely refiling upon issuance of the court's mandate. However, since Petitioners have failed to address the reopening standards in 10 C.F.R. § 2.326 and have also failed to demonstrate standing, their Petition should be denied.

BACKGROUND

A. Procedural History

This proceeding concerns the application submitted by Luminant Generation Company LLC (“Luminant” or “Applicant”) for combined licenses (“COLs”) for two reactor units at the Comanche Peak site in Somervell County, Texas. See Notice of Receipt and Availability of Application for a Combined License, 73 Fed. Reg. 66,276 (Nov. 7, 2008). The SEED Coalition timely filed a joint hearing request and petition for intervention with several other parties (collectively “Petitioners”).¹ Petition for Intervention and Request for Hearing (Apr. 6, 2009) (ADAMS Accession No. ML090970373). The Board ruled that the Petitioners had standing, admitted two contentions, and also deferred ruling on a third contention after the Applicant asserted it had provided additional information which rendered the contention moot. *Luminant Generation Company, LLC* (Comanche Peak Nuclear Power Plant, Units 3 & 4), LBP-09-17, 70 NRC 311, 382 (2009). The Board would eventually dismiss that deferred contention in a March 2010 Order, which also denied a hearing request on five newly submitted contentions. See *Luminant Generation Company, LLC* (Comanche Peak Nuclear Power Plant, Units 3 & 4), LBP-10-05, 71 NRC 329, 346 (2010). Following revisions to the Applicant’s environmental report (“ER”), the Board dismissed the two original admitted contentions as moot in a pair of orders, along with several newly proffered contentions. See *Luminant Generation Company, LLC* (Comanche Peak Nuclear Power Plant, Units 3 & 4), LBP-10-10, 71 NRC 529, 600-601 (2010) (dismissing one original contention in full, the other in part). With no live contentions remaining, the Board terminated the licensing proceeding in February 2011. See *Luminant Generation Company, LLC* (Comanche Peak Nuclear Power Plant, Units 3 & 4), LBP-11-04, 73 NRC 91, 128 (2011) (granting summary disposition in favor of the Applicant on all remaining contentions).

On June 8, 2012, the United States Court of Appeals for the D.C. Circuit vacated the

¹ Additional parties included Public Citizen, True Cost of Nukes, and Texas State Representative Lon Burnam.

NRC's Waste Confidence Decision Update and Temporary Storage Rule and remanded those rulemakings back to the agency. *New York*, 681 F.3d at 483. Shortly thereafter, Petitioners, together with various other organizations (including the aforementioned Public Citizen) submitted a petition requesting that the NRC "suspend its final licensing decisions in all pending NRC licensing proceedings pending completion of the remanded proceedings[.]" See *Petition to Suspend Final Decisions in All Pending Reactor Licensing Proceedings Pending Completion of Remanded Waste Confidence Proceedings*, at 3 (June 18, 2012) (ADAMS Accession No. ML12170B063). These petitioners also requested that the Commission establish a 60-day timetable for submitting new site-specific contentions based on the D.C. Circuit's ruling. *Id.* at 12.

As part of its response, the Staff averred that the Commission's normal adjudicatory procedures in 10 C.F.R. Part 2 provide "well-understood and appropriate means for raising contentions based on new information[.]" See *NRC Staff's Answer to Petition to Suspend Final Decisions in All Pending Reactor Licensing Proceedings Pending Completion of Remanded Waste Confidence Proceedings*, at 4-5 (June 25, 2012) ("Staff Answer"). Petitioners thereafter filed their Motion, which the Staff now answers.

B. The NRC's Waste Confidence Decision

In the National Environmental Policy Act of 1969 ("NEPA"), Congress announced a national policy "to create and maintain conditions under which man and nature can exist in productive harmony." 42 U.S.C. § 4331(a). NEPA requires the NRC to prepare an environmental impact statement ("EIS") to support a major Federal action, such as issuing a license for a power reactor. 42 U.S.C. § 4332. The NRC regulations in 10 C.F.R. Part 51 govern this process. Among other things, these regulations require applicants to submit an environmental report ("ER") as part of a licensing application to aid the NRC in conducting its environmental analysis. 10 C.F.R. § 51.41.

Before acting on a power reactor license application, NEPA requires the NRC to address

the environmental impacts of operation, including on-site storage and disposal of the reactor's spent fuel after the licensed period of operation ends. *Minnesota v. NRC*, 602 F.2d 412, 414-15, 419 (D.C. Cir. 1979). In the past, "the Commission sensibly has chosen to address high-level waste disposal generically." *Duke Energy Corp.* (Oconee Nuclear Station, Units 1, 2, and 3), CLI-99-11, 49 NRC 328, 345 (1999). The agency has most recently addressed issues pertaining to spent fuel storage and disposal in its "Waste Confidence Decision Update," 75 Fed. Reg. 81,037 (Dec. 23, 2010) ("Waste Confidence Decision") and a temporary storage rulemaking, "Consideration of Environmental Impacts of Temporary Storage of Spent Fuel after Cessation of Reactor Operation," Final Rule, 75 Fed. Reg. 81,032 (Dec. 23, 2010) ("Temporary Storage Rule").

The Waste Confidence Decision Update and the Temporary Storage Rule support generic findings in 10 C.F.R. § 51.23(a), regarding the impacts of spent fuel storage after the licensed period of operation. See Petition at 4; 10 C.F.R. § 51.23(a). The Commission rendered several findings in § 51.23(a). Two of those findings are (1) that spent fuel "can be stored safely and without significant environmental impacts for at least 60 years beyond the licensed life for operation" and (2) that "there is reasonable assurance that sufficient mined geologic repository capacity will be available . . . when necessary." 10 C.F.R. § 51.23(a). 10 C.F.R. § 51.23(b) relies on § 51.23(a) to exclude "discussion of any environmental impact of spent fuel storage [during] the period following the term of the reactor operating license" from any EIS, Environmental Assessment, or ER. 10 C.F.R. § 51.23(b).

DISCUSSION

The Petitioners based the proposed contention on the D.C. Circuit Court of Appeals' recent decision in *New York v. NRC*, 681 F.3d 471, 473 (D.C. Cir. 2012). The D.C. Circuit's decision vacated the NRC's updated Waste Confidence Decision and its Temporary Storage Rule and remanded those rulemakings to the NRC. *Id.* at 483. The proposed contention states as follows:

The EIS Report for Comanche Peak Units 3 & 4 does not satisfy NEPA because it does not include a discussion of the environmental impacts of spent fuel storage after cessation of operation, including the impacts of spent fuel pool leakage, spent fuel pool fires, and failing to establish a spent fuel repository, as required by the U.S. Court of Appeals in *State of New York v. NRC*, No. 11-1045 (June 8, 2012). Therefore, unless and until the NRC conducts such an analysis, no license may be issued.

Petition at 4. At root, the Petition asserts that because the generic findings in the Commission's rulemaking have been vacated, "the NRC no longer has any legal basis for Section 51.23(b), which relies on those findings to exempt both the agency staff and license applicants from addressing long-term spent fuel storage impacts in individual licensing proceedings." Petition at 4.

As discussed further below, the Staff recognizes that upon issuance of the D.C. Circuit's mandate, the underlying contention may meet the Commission's general contention admissibility requirements. However, the Staff concludes that in this proceeding, the Petitioners' failure to meet the standards for reopening the record require that the Petition be denied.

I. Contention Admissibility Standards

Although the contention was filed after the initial deadline for submitting contentions in this proceeding, the Petitioner asserts that it meets the standards of § 2.309(f)(2) for late-filed contentions. Petition at 6-7. Considering the holding of the D.C. Circuit and that the Petition was filed within 30 days of the ruling, the Staff agrees that, were § 2.309(f)(2) standards the applicable criteria in this proceeding,² the Petitioner could have sufficiently demonstrated the timeliness of its filing under that regulation.

The Board has previously discussed the Commission's standards for contention admissibility, which prohibit challenges to existing Commission regulations. *Luminant*

² The Commission has indicated that where there is no proceeding in which to file a new or amended contention, the standards of § 2.309(f)(2) do not apply; under such circumstances, a pleading seeking to introduce a new contention is simply a new intervention petition and must meet the standards of § 2.309(c) (and the standards of § 2.326 for reopening a closed record, if applicable). *Southern Nuclear Operating Co.* (Vogtle Electric Generating Plant, Units 3 and 4), CLI-11-08, 74 NRC __, __ (slip op. at 18 n.65) (Sept. 27, 2011).

Generation Company, LLC (Comanche Peak Nuclear Power Plant, Units 3 & 4), LBP-09-17, 70 NRC 311, 324-327 (2009). The Petitioner recognizes that “because the mandate has not yet issued in *State of New York*, this contention may be premature.” Petition at 2. Indeed, the Commission has observed, “A court acts only through its mandate. When a mandate is stayed, a decision has no binding effect . . .” *Public Service Co. of New Hampshire* (Seabrook Station, Units 1 and 2), CLI-76-17, 4 NRC 451, 466 (1976) (citing *Bailey v. Henslee*, 309 F.2d 840, 844 (8th Cir. 1962)). Thus, when a board suspended a construction permit because an appellate decision invalidated a relevant NRC regulation, the Commission overturned the board, in part, because that mandate had not yet issued. *Id.* at 467. Moreover, licensing boards have typically found contentions premature, and therefore inadmissible, when those contentions relied on court decisions for which a mandate had not issued. *E.g., Cleveland Elec. Illuminating Co.* (Perry Nuclear Power Plant, Units 1 and 2), LBP-82-53, 16 NRC 196, 205 (1982).³ As the licensing board in *Perry* stated, “Until that mandate is issued, the rules of the Commission remain in effect and this Board continues to be bound by them. As a result, the Court of Appeals’ decision does not as yet provide a ground for” an admissible contention.⁴ *Id.*

Under the Federal Rules of Appellate Procedure, a “court’s mandate must issue 7 days after the time to file a petition for rehearing expires or 7 days after entry of an order denying a timely petition for panel rehearing, petition for rehearing en banc or motion for stay of mandate,

³ But see *Louisiana Power and Light Co.* (Waterford Steam Electric Station, Unit 3), LBP-82-100, 16 NRC 1550, 1556-57 (1982) (noting that because “the mandate of that case has not been issued. . . we have deferred our rulings on these requests”).

⁴ The Commission recognizes its responsibility to “act promptly and constructively in effectuating the decisions of the courts.” *Vermont Yankee Nuclear Power Corp.* (Vermont Yankee Nuclear Power Station), CLI-76-14, 4 NRC 163, 166 (1976). Further, the Commission understands that “all that the mandate does is to effectuate the court of appeal’s judgment by formally returning the proceeding to the NRC[;] the eventual – legally required – issuance of the mandate is hardly an ‘unanticipated event.’” *Pacific Gas & Elec. Co.* (Diablo Canyon Power Plant Independent Spent Fuel Storage Installation), CLI-06-27, 64 NRC 399, 401 (2006). Thus, the Commission, of course, could decide to act prior to issuance of the court’s mandate. *Vermont Yankee*, CLI-76-14, 4 NRC at 166. However, in the instant case, the Commission cannot admit a contention that challenges an NRC regulation before a court of appeals issues its mandate striking down that regulation.

whichever is later.” Fed. R. App. P. 41(b). On July 6, 2012, at the Commission’s request, the D.C. Circuit extended the period of time to file a petition for rehearing of *New York v. NRC* to August 22, 2012. *New York v. NRC*, No. 11-1045 (D.C. Cir. July 6, 2012) (order granting unopposed motion to extend time period to seek rehearing). As a result, under Rule 41(b), the mandate is not likely to issue until at least August 29, 2012. Accordingly, because 10 C.F.R. § 51.23(b) remains in effect until the mandate issues, NRC regulations will continue to require exclusion of the Petitioner’s contention until the court issues the mandate. *Seabrook Station*, CLI-76-17, 4 NRC at 466. Consequently, the admissibility of the underlying contention depends on whether the mandate has issued when the Commission rules on the Petition.⁵

If the D.C. Circuit’s mandate issues before the Commission rules on the contention’s admissibility, upon the mandate’s issuance, the contention as pled would satisfy each of the § 2.309(f)(1) criteria and would be admissible as a contention of omission. See Petition at 4-6. This determination, however, would remain subject to direction or action taken by the Commission in response to the D.C. Circuit’s ruling, including any generic rulemaking action and/or issuance of any Commission instruction with respect to how contentions based on the court’s ruling are to be addressed in individual NRC proceedings. For example, in the event that the Commission solely undertakes a generic rulemaking approach to address these issues, the contention may need to be dismissed. See, e.g., *Oconee*, CLI-99-11, 49 NRC at 345 (“Licensing Boards ‘should not accept in individual license proceedings contentions which are (or are about to become) the subject of general rulemaking by the Commission.’”).

If the D.C. Circuit’s mandate has not issued by the time the Commission rules on the contention, then 10 C.F.R. § 51.23 will remain in place. That regulation excludes from NRC NEPA documents a consideration of the environmental impacts of onsite spent fuel storage

⁵ See 10 C.F.R. § 2.335(a) (noting that unless a party seeks a waiver of Commission regulations, “no rule or regulation of the Commission, or any provision thereof, concerning the licensing of production and utilization facilities . . . is subject to attack by way of discovery, proof, argument, or other means in any adjudicatory proceeding”).

after the licensed term of operation. Because the contention demands such a consideration, Petition at 4, the contention at present would constitute an impermissible attack on existing Commission regulations. 10 C.F.R. § 2.335(a). Accordingly, pending the issuance of the court's mandate, the contention should be rejected, subject to refiling without prejudice when, and if, the mandate issues. If the Petitioners were to refile the contention after the court issues the mandate, it would be timely if filed within 30 days of the mandate's issuance and would be otherwise admissible provided the claims it raises do not become the subject of a generic rulemaking. *Entergy Nuclear Vermont Yankee, L.L.C. and Entergy Nuclear Operations, Inc.* (Vermont Yankee Nuclear Power Station), CLI-11-02, 73 NRC 333, 342 n.43 (2011); *Oconee*, CLI-99-11, 49 NRC at 345. However, as discussed further below, independent of whether the contention were to meet the standards of § 2.309(f)(1) upon issuance of the court's mandate, the Petitioners' present failure to meet the standards for reopening the record requires denial of the Petition.

II. Reopening Standards

For its proposed new contention to be considered, Petitioners must satisfy the motion to reopen criteria in 10 C.F.R. § 2.326, in addition to the contention admissibility criteria in 10 C.F.R. § 2.309(f). As explained below, Petitioners' failure to address the factors of § 2.326 and to demonstrate its standing are both fatal to its Petition.

Because the Board has terminated the proceeding, Petitioners cannot simply file a new contention, but rather, they must move to reopen the record. *Luminant Generation Co., LLC* (Comanche Peak Nuclear Power Plant, Units 3 and 4), LBP-11-04, 73 NRC 91, 128 (2011); see *Southern Nuclear Operating Co.* (Vogtle Electric Generating Plant, Units 3 and 4), CLI-11-08, 74 NRC __, __ (slip op. at 2-3, 5) (Sept. 27, 2011). Where the record of a proceeding is closed, a pleading that addresses only the § 2.309(f) standards but not the § 2.326 standards should be rejected. See *Vogtle*, CLI-11-08, 74 NRC at __ (slip op. at 2-3, 5). Licensing boards do not need to "hunt for information" in a pleading to find something to satisfy each of the § 2.326

criteria, which the rules explicitly require to be identified and fully explained. *Id.* at __ (slip op at 8-9). The Commission has noted that its “rules place a heavy burden on petitioners who ask to have a record reopened,” and that a pleading “could have been rejected solely on the basis of the Appellants’ failure to comply fully with § 2.326(b).” *Id.* (citing *AmerGen Energy Co., LLC* (Oyster Creek Nuclear Generating Station), CLI-08-28, 68 NRC 658, 668-69 (2008)); *see also* *Dominion Nuclear Connecticut, Inc.* (Millstone Nuclear Power Station, Unit 3), CLI-09-05, 69 NRC 115, 125-26 (2009) (motion to reopen’s failure to address the late-filing standards was “reason enough to reject” the proposed contentions). As Petitioners do not move to reopen the record or address any of the § 2.326 criteria, the proposed contention should be rejected.

Furthermore, even if the failure to address the § 2.326 requirements was overlooked, Petitioners make no attempt to address their standing to intervene. Where a petitioner seeks to reopen the record and file a new contention, the petitioner must submit a “‘fresh intervention petition’ that fulfills the applicable standards that govern such filings, presumably including an appropriate standing demonstration.” *Southern Nuclear Operating Co.* (Vogtle Electric Generating Plant, Units 3 and 4), LBP-10-21, 72 NRC 616, 640 (2010) (citing *U.S. Army Installation Command* (Schofield Barracks, Oahu, Haw. & Pohakuloa Training Area, Island of Haw., Haw.), CLI-10-20, 72 NRC 185, 195 & n.56 (2010)).

Under the general standing requirements set forth in 10 C.F.R. § 2.309(d)(1), a request for hearing or petition for leave to intervene must state:

- (i) The name, address and telephone number of the requestor or petitioner;
- (ii) The nature of the requestor's/petitioner's right under the [Atomic Energy Act of 1954, as amended (Act)] to be made a party to the proceeding;
- (iii) The nature and extent of the requestor's/ petitioner's property, financial or other interest in the proceeding; and
- (iv) The possible effect of any decision or order that may be issued in the proceeding on the requestor's/ petitioner's interest.

10 C.F.R. § 2.309(d)(1).

An organization may establish its standing to intervene based on organizational standing (showing that its own organizational interests could be adversely affected by the proceeding) or representational standing (based on the standing of its members). Where an organization seeks to establish “representational standing,” it must show that at least one of its members may be affected by the proceeding and would have standing in his or her own right, it must identify that member by name and address, and it must show that the member “has authorized the organization to represent him or her and to request a hearing on his or her behalf.” See *e.g.*, *Consumers Energy Co.* (Palisades Nuclear Power Plant), CLI-07-18, 65 NRC 399, 409 (2007) (citations omitted); *CPU Nuclear Inc.* (Oyster Creek Nuclear Generating Station), CLI-00-6, 51 NRC 193, 202 (2000). Further, for the organization to establish representational standing, the interests that the organization seeks to protect must be germane to its own purpose, and neither the asserted claim nor the requested relief must require an individual member to participate in the organization’s legal action. *Private Fuel Storage*, CLI-99-10, 49 NRC at 323 (citing *Hunt v. Washington State Apple Advertising Comm’n*, 432 U.S. 333, 343 (1977)).

A petitioner who is admitted as a party in one proceeding must re-establish standing once the original proceeding is dismissed -- he may not simply rely on standing established in the prior proceeding. *Texas Utils. Electric Co.* (Comanche Peak Steam Electric Station, Unit 2), CLI-93-4, 37 NRC 156, 162-63 (1993).⁶ A prospective petitioner has an affirmative duty to demonstrate that it has standing in each proceeding in which it seeks to participate, since a

⁶ In *Comanche Peak*, the Petitioner had been admitted as a party to the Comanche Peak Unit 2 operating license proceeding, and was later withdrawn from the proceeding by request. CLI-93-4, 37 NRC at 158-59. The proceeding then continued until the parties reached a settlement agreement dismissing the operating license proceeding. *Id.* at 159. The Petitioner filed a petition for late intervention in the same proceeding, and subsequently filed a petition asking the Commission for the opportunity for a new hearing, both of which were denied. *Id.* Afterward, the Petitioner filed yet another petition for late intervention. *Id.* The Commission determined that the Petitioner had not demonstrated that it had standing based on the documents filed in its previous attempt to re-intervene, and that the petition was thus deficient. *Id.* at 163. However, the Commission declined to rely on that flaw to dismiss the petition, instead relying on the Petitioner’s failure to meet other requirements. *Id.*

petitioner's status can change over time and the bases for its standing in an earlier proceeding may no longer apply. *Id.* A petitioner may seek to rely on prior demonstrations of standing if those prior demonstrations are (1) specifically identified and (2) shown to correctly reflect the current status of the petitioner's standing. *Id.* Because Petitioners did not attempt to establish their standing through a fresh showing, nor did they specifically identify a prior demonstration of standing along with a showing that it correctly reflects the current status of its standing, Petitioners have failed to demonstrate standing in this proceeding.

As Petitioners have not demonstrated that they meet the criteria for motions to reopen in § 2.326 or that they have standing, the proposed contention should be rejected.

CONCLUSION

For the foregoing reasons, the Staff agrees with the Petitioners that the contention would be admissible upon issuance of the D.C. Circuit's mandate in *New York v. NRC*. However, if the Commission rules before that time, the contention must be rejected as an impermissible challenge to NRC regulations. Finally, the admission of this contention is subject to any further action by the Commission, including commencement of a generic rulemaking to address these matters, and/or the issuance of instructions as to how the contention should be addressed.

/Signed (electronically) by/

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CERTIFICATE OF SERVICE

I hereby certify that copies of the NRC Staff Answer to Motion for Leave to File a New Contention Concerning Temporary Storage and Ultimate Disposal of Nuclear Waste at Comanche Peak Nuclear Power Plant, dated June 25, have been served upon the following persons by Electronic Information Exchange this 3rd day of August, 2012:

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Dated at Rockville, Maryland
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