



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

April 29, 2015

EN 50750

Mr. Adam Hilton  
FMO Facility Manager  
Global Nuclear Fuel – Americas, L.L.C.  
P.O. Box 780, Mail Code J20  
Wilmington, NC 28402

**SUBJECT: GLOBAL NUCLEAR FUEL – AMERICAS, L.L.C. – U.S. NUCLEAR REGULATORY  
COMMISSION INTEGRATED INSPECTION REPORT 70-1113/2015-002**

Dear Mr. Hilton:

This letter is to document the closure of U.S. Nuclear Regulatory Commission (NRC) Integrated Report 70-1113/2015-002 for the first quarter in calendar year 2015 (January 1 through March 31, 2015). The purpose of the inspection was to review implementation of programs and procedures for emergency preparedness, fire protection, and operational safety. The reviews were conducted to determine whether licensed activities were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of this inspection. At the conclusion of the inspection, the results were discussed with you and members of your staff at exit meeting on February 12, 2015.

During the inspection, the staff examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of facility walk-downs; selective examinations of relevant procedures and records; interviews with plant personnel; and plant observations. Throughout the inspection, observations were discussed with your managers and staff. Based on the results of the inspection, no violations of NRC requirements were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, of NRC's "Rules of Practice and Procedure," a copy of this letter and the enclosure will be made available electronically for public inspection in the NRC Public Document Room, or from the NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please call me at 404-997-4629.

Sincerely,

*/RA/*

Marvin D. Sykes, Chief  
Projects Branch 2  
Division of Fuel Facility Inspection

Docket No. 70-1113  
License No. SNM-1097

Enclosure:  
NRC Inspection Report 70-1113/2015-002  
w/Supplemental Information

cc:  
Scott Murray, Manager  
Facility Licensing  
Global Nuclear Fuels – Americas, L.L.C.  
Electronic Mail Distribution

W. Lee Cox, III, Chief  
North Carolina Department of Health and Human Services  
Division of Health Service Regulation  
Radiation Protection Section  
Electronic Mail Distribution

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Electronic Mail Distribution

**DISTRIBUTION:**  
R. Johnson, NMSS  
M. Baker, NMSS  
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ADAMS: ☒ Yes      ACCESSION NUMBER: ML15119A003      ☒ SUNSI REVIEW COMPLETE      ☒ FORM 665 ATTACHED

OFFICE	RII:DFFI	RII:DFFI	RII:DFFI				
SIGNATURE	/RA/	/RA/	/RA/				
NAME	MCrespo	NPitoniak	KKirchbaum				
DATE	4/22/2015	4/21/2015	4/21/2015				
E-MAIL COPY	YES   NO	YES   NO	YES   NO	YES   NO			

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U.S. NUCLEAR REGULATORY COMMISSION  
REGION II

Docket No.: 70-1113

License No.: SNM-1097

Report Nos.: 70-1113/2015-002

Licensee: Global Nuclear Fuel - Americas, LLC

Location: Wilmington, North Carolina 28402

Dates: January 1 through March 31, 2015

Inspectors: N. Pitoniak, Fuel Facility Inspector (Section B.1)  
K. Kirchbaum, Fuel Facility Inspector (Sections A.1)  
M. Crespo, Senior Fuel Facility Inspector (Section A.2)

Approved by: M. Sykes, Chief  
Projects Branch 2  
Division of Fuel Facility Inspection

Enclosure

## **EXECUTIVE SUMMARY**

Global Nuclear Fuel - Americas, LLC  
NRC Integrated Inspection Report Nos. 70-1113/2015-002  
January 1 through March 31, 2015

Inspections were conducted by NRC regional inspectors during normal shifts in the areas of emergency preparedness, fire protection, and operational safety. During the inspection period, normal production activities were ongoing. These announced, routine inspections consisted of a selective examination of procedures and representative records, observations of activities, walk-downs of items relied on for safety (IROFS), and interviews with licensee personnel. No safety significant findings were identified.

### **Safety Operations**

- The IROFS reviewed were properly implemented and maintained in order to perform their intended safety function. (Paragraph A.1)
- The fire protection program was implemented in accordance with the license application and regulatory requirements. (Paragraph A.2)

### **Facility Support**

- The Emergency Preparedness program was implemented in accordance with the Emergency Plan and regulatory requirements. (Paragraph B.1)

### **Attachment**

Key Points of Contact  
List of Items Opened, Closed, and Discussed  
Inspection Procedures Used  
Documents Reviewed

## **REPORT DETAILS**

### **Summary of Plant Status**

Global Nuclear Fuel – Americas (GNF-A), LLC manufactures uranium dioxide (UO<sub>2</sub>) powder, pellets, and light water reactor fuel bundles at its Wilmington, NC facility. The facility converts uranium hexafluoride (UF<sub>6</sub>) to UO<sub>2</sub> using a Dry Conversion Process (DCP) and performs UO<sub>2</sub>, gadolinium pellet and fuel fabrication operations. During the inspection period, normal production activities were ongoing.

#### **A. Safety Operations**

##### **1. Operational Safety (Inspection Procedure (IP) 88020)**

###### **a. Inspection Scope and Observations**

During the onsite period of this inspection, the Dry Conversion Process (DCP) was shutdown for plant modifications associated with Event Notification (EN) 50750 in which non-conservative values were noted in the Cold Trap accident sequence. The inspectors were able to observe acceptance testing for newly developed items relied on for safety (IROFS) associated with the Cold Trap. The inspectors interviewed staff and reviewed records associated with the DCP Powder Outlet, Homogenization, Blend, Pre-Concentration, Granulation (BPG). The inspectors determined that IROFS associated with DCP are being adequately implemented and properly communicated as described in the Integrated Safety Analysis (ISA). The following IROFS were selected as samples for the inspection:

- IROFS 204-02, Cooling Hopper Moisture Detection System
- IROFS 204-03, Favorable Geometry Hybrid Container
- IROFS 204-04, Process Equipment Barrier – Powder Outlet
- IROFS 205-02, Homogenizer External Oil Volume
- IROFS 205-04, Non-Hydrogenous Oil
- IROFS 205-06, Process Equipment Barrier – Homogenizer Utility Hood
- IROFS 205-08, Process Equipment Barrier – Homogenizer
- IROFS 206-03, FRS/LIMS Blend Plan Verifies Moderator Content
- IROFS 206-07, Volume Limited Reservoir – Blender
- IROFS 206-10, Process Equipment Barrier – BPG Process

The inspectors confirmed that the IROFS associated with DCP were present and capable of performing their intended safety function(s). To complete this confirmation, the inspectors verified the physical presence of passive and active engineered safety controls, evaluated the safety controls to determine their capability and operability, and verified that potential accident scenarios were covered.

The inspectors determined that the licensee's administrative controls were properly implemented and communicated. The inspectors reviewed the operating procedures for DCP and determined that required actions as identified in the ISA Summary have been correctly transcribed into written operating procedures. The inspectors evaluated procedure contents with respect to operating limits and operator responses for upset conditions and verified that limits needed to assure safety were adequately described in

the procedures. Through interviews and document reviews, the inspectors verified that the licensee had conducted preventive maintenance, calibration, and periodic surveillances as required by the ISA Summary for DCP system.

The inspectors interviewed plant operators and supervisors to verify an understanding with procedural compliance and IROFS verifications. A sample of operator qualification records were reviewed to ensure that the required training was completed and those qualifications were representative to the individual job function with an emphasis on IROFS. The inspectors reviewed the postings and operator aids applicable to the tasks being observed and determined that these postings and operator aids were current, addressed safety controls, and were followed by the operators. The inspectors performed plant walkdowns for equipment condition and general plant housekeeping to determine if the overall material condition was being maintained in a manner to support proper plant operation.

The inspectors reviewed a sampling of the licensee's corrective action program (CAP) entries for the past 12 months and determined that noted deviations from procedures and unforeseen process changes affecting nuclear criticality, chemical, radiological, or fire safety were appropriately documented and investigated promptly. Also, the inspectors evaluated the corrective actions and determined that the completed corrective actions were adequate.

b. Conclusion

No findings of significance were identified.

2. Fire Protection-Annual (IP 88055)

a. Inspection Scope and Observations

The inspectors reviewed GNF-A Fire Protection procedures and toured plant areas containing safety controls and IROFS to assess the material condition of fire protection equipment, systems, and features. The inspectors verified that flammable materials were stored in marked cabinets as specified in approved procedures and that housekeeping and the control of combustible materials were adequate and consistent with the approved procedures.

The inspectors reviewed records and interviewed GNF-A personnel to verify that the observed fire protection systems were maintained in an adequate state of readiness and had been properly tested to verify their ability to perform their safety function. The inspector noted that significant progress had been made addressing the findings from the 2010 Sprinkler System Obstruction Review Report, Revision (Rev.) 1. The inspectors determined that fire dampers, doors, and penetration seals were being maintained in a condition that would ensure they were available and reliable to perform their safety function. Flammable liquid storage cabinets, and portable fire extinguishers were adequately maintained and access was unobstructed.

Based on field observations and discussions with licensee personnel, the inspectors determined that firefighting vehicles and supplies were adequately maintained and available for use. Firefighting vehicles were observed to be stocked with appropriate equipment and supplies. Personnel protective equipment for emergency response personnel was available for use and adequately maintained. The inspectors observed

that the licensee verified the accuracy of the pre-fire plans on an annual basis. The inspectors walked down various areas of the controlled area and assessed the condition of emergency lighting.

The inspectors reviewed the GNF-A CAP entries since the last fire protection inspection and determined that the GNF-A is identifying safety control or IROFS fire protection operability problems at an appropriate threshold and entering them into the CAP. Also, the inspectors evaluated the corrective actions associated with condition reports (CRs) and determined that those completed corrective actions are adequate with additional corrective actions scheduled for completion. The inspectors observed the licensee perform the quarterly combustible audit of the DCP and Fabrication areas and noted no issues. The inspectors also reviewed the records for the audits conducted in 2014 and found no issues.

The inspectors reviewed Emergency Response Organization (ERO) drills for the past year and verified the Emergency Response Team (ERT) members received training and participated in drills at least an annual basis. The inspectors noted that the emergency response team members were assigned a monthly training schedule to ensure adequate readiness. The inspectors interviewed several emergency response team members to assess their training and ability to response to emergencies and noted no deficiencies.

b. Conclusion

No findings of significance were identified.

B. Facility Support

1. Emergency Preparedness (IP 88050)

a. Inspection Scope and Observations

The inspectors interviewed staff and reviewed records and determined that any changes made to the Emergency Plan or within the facility had been properly coordinated within the Emergency Preparedness program. The inspectors reviewed procedures with significant revisions since the last emergency preparedness inspection and determined that the changes were in compliance with the Emergency Plan. The inspectors reviewed the licensee emergency call list and verified that the list was current.

The inspectors reviewed training records and interviewed licensee staff regarding emergency preparedness training in the past year. The inspectors verified that the licensee provided training for their personnel and emergency equipment as required by the Emergency Plan and that the individuals responsible for utilizing the equipment were qualified. The inspectors verified that the licensee provided training to hypothetical emergency situations which were effective and consistent with the frequency and performance objectives required in the Emergency Plan.

The inspectors reviewed the written agreements with the off-site agencies and verified that the organizations required by the Emergency Plan had up-to-date agreements. The inspectors interviewed representatives of the New Hanover Regional Medical Center, the New Hanover County Department of Emergency Management, and the New Hanover County Sheriff's Department and determined that they maintained an adequate understanding of the written agreements. The inspectors determined that the licensee



invited the off-site support organizations for training as required by the Emergency Plan and determined that the training given was appropriate. The inspectors reviewed records and verified that the licensee performed a communication checks with the off-site organizations at a quarterly frequency as required by the Emergency Plan.

The inspectors observed the storage of emergency equipment in the Emergency Control Center (ECC) and verified that the inventory levels were maintained as required by the Emergency Plan. The inspectors toured the ECC and Off-site Alternate ECC and verified that the areas were readily assessable and maintained the appropriate amount of communication equipment. The inspectors reviewed the accountability procedures and inspected staging areas and verified that accountability meeting points were assessable.

The inspectors verified that problems or deficiencies associated with the Emergency Plan were identified and corrected. The inspectors reviewed the self-assessments generated since the last inspection and verified that a system was in place for adequately tracking and resolving self-assessment findings.

b. Conclusion

No findings of significance were identified.

C. Exit Meeting

The inspection scope and results were presented to members of the licensee's staff at various meetings throughout the inspection period and were summarized on February 12, to A. Hilton and staff. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

## **SUPPLEMENTAL INFORMATION**

### **1. KEY POINTS OF CONTACT**

<u>Name</u>	<u>Title</u>
Beaty, F.	PP&SS Area Engineer
Berger, J.	Manager, PP&SS
Degolyer, J.	ISA Projects Manager
Dodds, M	Sr. Criticality Safety Engineer
Dunn, E.	Criticality Safety Engineer
Eghbali, D.	Senior Criticality Safety Engineer
Hilton, A.	FMO Operations Leader & Facility Manager
Lachance, P.	FMO Maintenance
Latham, U.	Sr. Admin Specialist, Licensing
Lilge, B	Manager, Ops Support
Murray, S	Manager, Licensing
Ollis, P.	Licensing Engineer, Licensing and Liabilities
Reeves, J.	Manager, Integrated Safety Analysis
Rohner, J.	Manager, Criticality Safety Program

### **2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

#### Opened

EN 50750	Non-conservative values noted in the Cold Trap Accident Sequence
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### **3. INSPECTION PROCEDURES USED**

IP 88020 Operational Safety  
IP 88050 Emergency Preparedness  
IP 88055 Fire Protection (Annual)

### **4. DOCUMENTS REVIEWED**

#### Procedures:

CP-16-114, Revision 0.1, Human Performance Observation and Coaching  
FTI 1333-01a, Rev. 6, Prevent Excess Moderation in the Cooling Hopper by Shutting off UF6 Feed to Reactor Followed by Hydrolysis and Pyro hydrolysis Steam Shutdown 5 Minutes Later when Moisture Detection Probes Exceed High Limit of 0° for 5 Minutes  
FTI 1333-01b, Rev. 5, Prevent Excess Moderation in the Cooling Hopper by Shutting Off UF6 feed to Reactor Followed by Shutting Off all Steam to Kiln Five Minutes Later When Moisture Detection Probes Experience Low N2 Flow for Three Minutes (Unable to Analyze for Moisture)

Attachment

FTI 1333-02, Rev. 6, Prevent Excess Moderation in the Cooling Hopper by Maintaining at Least One Closed Block Valve (XV#2915 or XV#2916) Between Kiln Outlet Hopper and Cooling Hopper

FTI-1333-03, Rev. 4, Close XV#3908/28 to Prevent Airborne Contamination Due to Discharge of Powder with Insufficient Seal, Fit Up Not Lowered or Container Not in Position

FTI-1333-04, Rev. 3, Required Safety Key Switch to Open XV #308/28 to Dump Cooling Hoppers after a HHI Moisture Detection (Sustained for > 5 Minutes)

FTI 1334-02, Rev. 8a, Prevent Discharging Excess Mass in Unicone NSE Limit 500 KG Net Weight. Scale Hardware Interlock Set to 710 Kg (WSH#4401)

FTI-1334-03, Rev. 5, Prevent Excess Moderation to the Homogenizer by Stopping Powder Feed through Flow Controller M#4801 Before Exceeding High Weight Limit of 2800 Kg

FTI-1335-01, Rev. 8.1, Prevent FBS Setup and Execution of a Blend Plan that Violates the Mass requirements for the Blender

FTI-1335-02, Rev. 11, Prevent Setup and Execution of a Blend Plan that Exceeds the Total Moderation Mass Limits for the Blender

FTI-1335-10, Rev. 10.2, Prevent Excess Mass in the Unicone (>490 kg) and the Bicone (450 Kg)

OP 1080.02, Combustible Material Control – UF6 Storage and Handling, Rev 5

OP 1300.00, Combustible Material Control – DCP, DSR, Powder Pack/ Receipt and Fire Barrier, Rev 4

OP 1002.00, Combustible Material Control – Fabrication, Rev 1

OP 1333.00.100, Rev. 00, DCP Powder Outlet – General Information

OP 1333.00.201, Rev. 01, DCP Powder Outlet – Startup

OP 1333.00.202, Rev. 03, DCP Powder Outlet – Normal Operations

OP 1333.00.205, Rev. 02, DCP Powder Outlet – Abnormal Operations

OP 1335.00.100, Rev. 02, DCP Blend Pre-Compact Granulate – General Information

OP 1335.00.201, Rev. 01, DCP Blend Pre-Compact Granulate – Loading Powder & Additives

OP 1335.00.202, Rev. 01, DCP Blend Pre-Compact Granulate – Press & Granulator Startup

OP 1335.00.203, Rev. 01, DCP Blend Pre-Compact Granulate – BPG Discharge & Cleanout

OP 1335.00.206, Rev. 01, DCP Blend Pre-Compact Granulate – Abnormal Operations

OP 1335.00.207, Rev. 00, DCP Blend Pre-Compact Granulate – Alarm Response & Emergency Operations

OP 1335.00.207, Rev. 00, DCP Blend Pre-Compact Granulate – Basic Operator Maintenance

OP 1335.00.207, Rev. 00, DCP Blend Pre-Compact Granulate – Process Information

DCP CSA No. 1333.01, Rev. 09, Criticality Safety Analysis, DCP Conversion Process – Powder Outlet

CP-28-113, RC&EP Surveillance and Maintenance, Rev. 1.0

Radiological Contingency and Emergency Plan (RC & EP), Rev. 22

RC&EP-1, Bomb Threat, Rev. 25

RC&EP-2, Environmental Chemical/Toxic Hazards, Rev. 30

RC&EP-4, Imminent Threat, Rev. 27

RC&EP-5, Criticality, Rev. 33

RC&EP-6, Fire and Explosion, Rev. 6

RC&EP-7, Radiological, Rev. 7

RC&EP-8, Severe Weather, Rev. 8

RC&EP-9, Transportation, Rev. 9

Work Instruction (WI)-27-109-01, Hot Work Permits, Rev 2.0

WI-27-110-01, Fire Extinguisher Inspection, Maintenance and Replacement, Rev 3.0

WI-27-110-16, Sprinkler System Water Supply Valve Monthly Inspection, Rev 1.0

WI-27-110-17, Sprinkler System Quarterly Inspection and Flow Alarm Test, Rev 2.0  
 WI-27-110-18, Sprinkler System Semi-Annual Supervisory Device Test, Rev 1.0  
 WI-27-110-25, Dry Pipe Sprinkler System Weekly Inspection, Rev 1.0  
 WI-20-108-01, Emergency Organization Initial Qualification and Requalification Training, Rev. 2.2  
 WI-28-114-07, Communications Advisor, Rev. 1.0  
 WI-28-114-09, Radiological Safety Coordinator, Rev. 0.0  
 WI-28-114-11, Staging Area Supervisor, Rev. 0.0  
 WI-28-114-15, Emergency Organization Activation, Rev. 3.0  
 WI-28-114-16, Emergency Classification and Notification, Rev. 1.0  
 WI-28-114-17, Hazard Assessments, Rev. 0.0  
 WI-28-118-01-F02, Reduction in Effectiveness Review, Rev.0

Condition Reports Written as a Result of the Inspection:

13694, WI-20-108-03-F01, Emergency Director Qualification  
 13751, Sprinkler coverage evaluation  
 13753, Addition of smoke detector

Other Documents:

GNF-A Conduct of Operations, Rev. 1  
 QRA-204-205-206, Rev. 10, DCP – Powder  
 IROFS 204-03, Favorable Geometry Hybrid Container, Completed December 16, 2014  
 IFOFS 205-08, Process Equipment Barrier – Homo, Completed December 16, 2014  
 IROFS 204-04, Process Equipment Barrier – Powder Outlet, Completed December 16, 2014  
 IROFS 205-03, Homogenizer Lid Design, Completed December 16, 2014  
 FHA 1001.00, Graded Fire Hazards Analysis, Fuel Fabrication Operation, Rev. 0  
 FHA 1320.00, Graded Fire Hazards Analysis, DCP, Rev. 0  
 Completed Functional Test Instructions (Various)  
 Operator DCP Qualification Records (Various)  
 2014 GNF-A RC&EP Audit, dated December 31, 2014  
 2014 First Quarter Drill Critique, dated February 28, 2014  
 2014 Second Quarter Drill Critique, dated June 26, 2014  
 2014 Second Quarter IED Qualification Drill Critique, dated April 29, 2014  
 2014 Third Quarter Drill Critique, dated September 10, 2014  
 2014 Fourth Quarter Drill Critique, dated November 17, 2014  
 EHS Vehicle Monthly Equipment Checklist, dated January 15, 2014; February 13, 2014; March 6, 2014; April 14, 2014; May 12, 2014; June 13, 2014; July 14, 2014; August 15, 2014; September 11, 2014; October 15, 2014; November 12, 2014; December 11, 2014  
 CP-28-113-F04, ECC RP Equipment, dated February 3, 2014; February 26, 2014; March 26, 2014; April 30, 2014; May 30, 2014; June 25, 2014; July 23, 2014; August 13, 2014; September 29, 2014; October 31, 2014; November 11, 2014; December 29, 2014  
 CP-28-113-F05, WFSC Equipment, dated February 14, 2014; March 12, 2014; April 7, 2014; May 9, 2014; June 30, 2014; July 18, 2014; August 21, 2014; September 7, 2014; October 27, 2014; November 24, 2014; December 15, 2014  
 CP-28-113-F06, Portable Kit Equipment, dated September 25, 2014, October 31, 2014, November 11, 2014, December 30, 2014  
 CP-28-113-F08, ECC Environmental Equipment Checks, dated January 3, 2014, April 30, 2014, July 2, 2014, October 2, 2014, December 22, 2014  
 CP-28-113-F07, Hospital RP Equipment, dated October 28, 2014  
 1CP-28-113-F01, ECC Procedures, dated December 17, 2014, February 2, 2015  
 CP-28-113-F02, On-site Procedures, dated December 17, 2014, February 4, 2015  
 CP-28-113-F03, Off-site Procedures, dated January 5, 2015

CP-28-113-F10, ECC, dated December 15, 2014  
 CP-28-113-F11, Alternate ECC, dated December 15, 2014  
 CP-28-113-F13, Evacuation Paths/Staging Areas, dated November 14, 2014  
 CP-28-113-F14, Site Medical Clinic, dated September 25, 2014, December 1, 2014, February 4, 2015  
 CP-28-113-F15, ECC Drawings, dated January 14, 2015  
 Staging Area equipment checks dated January 16, 2014, February 28, 2014, March 28, 2014, April 21, 2014, May 30, 2014, June 17, 2014, July 22, 2014, August 22, 2014, September 29, 2014, October 21, 2014, December 1, 2014, December 29, 2014, January 28, 2015  
 GEH-GSC-0001, Controlled Access Area Training Brief, dated December 2014  
 Wilmington Site Access Briefing, dated May 2014  
 New Hanover County Fire and Rescue (NHCFR) and Global Nuclear Fuel-America-L.L.C. (GNF) Memorandum of Understanding, dated August 11, 2011  
 Memorandum of Assistance between the New Hanover County Department of Emergency Management and Global Nuclear Fuels – America, dated July 22, 2011  
 Letter of Agreement between Global Nuclear Fuel – Americas LLC and New Hanover Regional Medical Center and New Hanover Regional Emergency Medical Services, dated December 5, 2011  
 Letter of Agreement between the New Hanover County Sheriff's Office and Global Nuclear Fuel – America LLC, dated August 29, 2012  
 MDV-15-101, 2014 RC&EP Audit Response and Condition Report (CR) 13279 closure, dated January 10, 2015  
 MDV-14-011, GNF-A 3rd Quarter Emergency Response Telephone Listing, dated December 15, 2014

Condition Reports Reviewed:

2695, 3184, 9399, 9445, 9446, 9448, 9449, 9485, 9487, 9501, 9633, 9640, 9641, 9673, 9674, 10104, 10315, 10316, 10317, 10734, 10958, 10992, 11120, 11434, 11471, 12022, 12134, 12138, 12236, 12517, 13279