

**RESPONSE TO FREEDOM OF  
INFORMATION ACT (FOIA) REQUEST**

see below

1

RESPONSE  
TYPE☐

INTERIM

☒

FINAL

## REQUESTER:

Julian Tarver

## DATE:

12/07/2017

## DESCRIPTION OF REQUESTED RECORDS:

"NRC Staff's Response to Commission Order to Provide Reference List and Vaughn Index" (NRC-2018-000036), "San Luis Obispo Mothers for Peace's Response to Staff's Vaughn Index ... (NRC-2018-000037), and "all discovery requests sent from and to NRC and San Luis Obispo Mothers for Peace" (NRC-2018-000038).

**PART I. -- INFORMATION RELEASED**

You have the right to seek assistance from the NRC's FOIA Public Liaison. Contact information for the NRC's FOIA Public Liaison is available at <https://www.nrc.gov/reading-rm/foia/contact-foia.html>

- ☐ Agency records subject to the request are already available on the Public NRC Website, in Public ADAMS or on microfiche in the NRC Public Document Room.
- ☒ Agency records subject to the request are enclosed.
- ☐ Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
- ☐ We are continuing to process your request.
- ☒ See Comments.

**PART I.A -- FEES**

AMOUNT\*

\*See Comments for details.

- ☐ You will be billed by NRC for the amount listed.
- ☐ You will receive a refund for the amount listed.
- ☐ Fees waived.

**NO FEES**

- ☒ Minimum fee threshold not met.
- ☐ Due to our delayed response, you will not be charged fees.

**PART I.B -- INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE**

- ☐ We did not locate any agency records responsive to your request. *Note:* Agencies may treat three discrete categories of law enforcement and national security records as not subject to the FOIA ("exclusions"). 5 U.S.C. 552(c). This is a standard notification given to all requesters; it should not be taken to mean that any excluded records do, or do not, exist.
- ☐ We have withheld certain information pursuant to the FOIA exemptions described, and for the reasons stated, in Part II.
- ☐ Because this is an interim response to your request, you may not appeal at this time. We will notify you of your right to appeal any of the responses we have issued in response to your request when we issue our final determination.
- ☒ You may appeal this final determination within 90 calendar days of the date of this response by sending a letter or e-mail to the FOIA Officer, at U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001, or [FOIA.Resource@nrc.gov](mailto:FOIA.Resource@nrc.gov). Please be sure to include on your letter or email that it is a "FOIA Appeal." You have the right to seek dispute resolution services from the NRC's Public Liaison, or the Office of Government Information Services (OGIS). Contact information for OGIS is available at <https://ogis.archives.gov/about-ogis/contact-information.htm>

**PART I.C COMMENTS ( Use attached Comments continuation page if required)**

This also serves to acknowledge our receipt of these three FOIA requests. As we already advised you in our acknowledgment of NRC-2018-000036 and 2018-000037, your request for a fee waiver has been denied as you have not addressed the eight factors set forth in the NRC's FOIA regulations, at 10 C.F.R. 9.41. We also wish to call to your attention 10 C.F.R. 9.39(e) of these same regulations, which provides that "The NRC may aggregate requests in determining search and duplication to be provided without charge as provided in paragraphs (a) and (b) of this section, if the NRC finds a requester or group of requesters acting in concert, has filed multiple requests that actually constitute a single request, [continued on next page]

Signature - Freedom of Information Act Officer or Designee

Stephanie A. Blaney

Digitally signed by Stephanie A. Blaney

Date: 2017.12.07 12:08:33 -05'00'

**RESPONSE TO FREEDOM OF INFORMATION  
ACT (FOIA) REQUEST Continued**

see below

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**PART I.C COMMENTS (Continued)**

and that the requests involve clearly-related matters." Since your three requests ask for discovery-related records generated during a single litigation matter, and were submitted at the same time, we have aggregated them for fee purposes, as well as for this response. There are no records responsive to NRC-2018-000038; as such, we have checked the box indicating your right to appeal the "no record" response with respect to NRC\_2018-000038 only. We have enclosed the two records you requested in NRC-2018-000036 and NRC-2018-000037, as the duplication charges associated with their release do not exceed the threshold at which you would incur fees.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of	)	
	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	Docket No. 72-26-ISFSI
	)	ASLBP No. 08-860-01-ISFSI-BD01
(Diablo Canyon Power Plant Independent	)	
Spent Fuel Storage Installation)	)	

NRC STAFF'S RESPONSE TO COMMISSION ORDER TO  
PROVIDE REFERENCE LIST AND VAUGHN INDEX

In accordance with the Commission's direction in the Diablo Canyon proceeding<sup>1</sup>, the Staff hereby provides, as Attachment A, a complete list of references for the Supplement to the Environmental Assessment ("EA") issued August 2007.<sup>2</sup> Additionally, the Staff provides, as Attachment B, a *Vaughn* index in which each reference is identified with an ADAMS Accession Number. As explained further below, the reference documents containing sensitive security information have been made publicly available under the identified accession numbers to the extent that they contain information which supported the Staff's Supplement to the EA and to the extent they contain information which is not protected from public disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, exemptions.

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<sup>1</sup> *In the Matter of Pacific Gas and Electric Co.* (Diablo Canyon Power Plant Independent Spent Fuel Storage Installation) CLI-08-01, 66 NRC \_\_\_\_ (January 15, 2008), slip op. at 30, as modified by the Commission's *Order* issued January 25, 2008, granting the Staff an extension until February 13, 2008 to comply with the Commission's directive to provide a complete list of references and a *Vaughn* index to the Commission and the parties.

<sup>2</sup> "Supplement to the Environmental Assessment and Final Finding of No Significant Impact Related to the Construction and Operation of the Diablo Canyon Independent Spent Fuel Storage Installation"

For nearly all references containing security information, the Staff has provided the complete document, including all attachments, except for information withheld under the FOIA exemptions identified in the *Vaughn* index. However, certain attachments were not relied on by the Staff in any respect in developing the Supplement to the EA and therefore were not included in the Staff's extensive FOIA review and redaction process but instead have been withheld in their entirety. Specifically, the Staff has withheld two attachments to Document No. 6 (ADAMS Accession No. ML080440117) that address the transportation of spent fuel and radioactive materials because they do not contain information which was utilized or relied on by the Staff in its environmental review of the Diablo ISFSI. The Staff has also withheld an attachment to the Commission Report to Congress on the National Academy of Sciences Study on the Safety and Security of Commercial Spent Nuclear Fuel Storage (ADAMS Accession No. ML050280428) because it was not reviewed or relied on by the Staff in developing the Supplement to the EA.

Regarding the Staff's review and redaction process, it should be noted that the Staff performed a line-by-line review of all information in the reference documents which was not already marked as classified information. For classified information, redactions were performed according to existing classification markings which were on a paragraph-by-paragraph basis in accordance with agency practice.

Respectfully Submitted,

/RA/

Lisa B. Clark  
Molly Barkman  
Counsel for NRC Staff

Dated at Rockville, MD  
This 13<sup>th</sup> day of February, 2008

## **Attachment A**

### **References Used by the NRC Staff for the Diablo Canyon ISFSI Environmental Assessment Supplement**

1. "Results of a Large Airplane Impact into a Field of Holtec HI-STORM Spent Nuclear Fuel Storage Casks." Smith, J.A., et al. Sandia National Laboratories, Albuquerque, NM. 2004. ADAMS Accession No. ML080440139.
2. "Response of the HI-STORM Spent Nuclear Fuel Storage Cask to a Large Explosive Charge Blast." Kipp, M.E., et al. Sandia National Laboratories, Albuquerque, NM. 2004. ADAMS Accession No. ML080440144.
3. "NRC Spent Fuel Source Term Guidance Document." Yoshimura, R.H., et al. Sandia National Laboratories, Albuquerque, NM. 2004. ADAMS Accession No. ML080440180.
4. Memorandum from L. Reyes to the Commission, "Completion of Security Assessment of Spent Fuel Storage Casks for Land-Based Terrorist Threats," September 15, 2005. ADAMS Accession Nos. ML052490378, ML080440115.
5. Memorandum from L. Reyes to the Commission, "Completion of Security Assessment of the Crash of a Large Plane into Spent Fuel Storage Casks," September 15, 2005. ADAMS Accession Nos. ML052490377, ML080440116.
6. Memorandum from J. Strosnider to R. Zimmerman, "Framework Assessments of Spent Fuel Storage Casks and Radioactive Material Transportation Packages," December 9, 2005. ADAMS Accession Nos. ML053290260, ML080440117.
7. Staff Requirements-SECY-04-0222-Decisionmaking Framework for Materials and Research and Test Reactor Vulnerability Assessments." ADAMS Accession No. ML080440118.
8. SECY-04-0222 "Decision-Making Framework for Materials and Research and Test Reactor Vulnerability Assessments." ADAMS Accession No. ML080440119.
9. "In the Matter of Pacific Gas and Electric, Diablo Nuclear Power Plant Independent Spent Fuel Storage Installation, Order Modifying License (Effective Immediately)." ADAMS Accession No. ML080440120.
10. "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs." NUREG-1748. U.S. Nuclear Regulatory Commission. August 2003. ADAMS Accession No. ML032450279.
11. *Environmental Assessment and Finding of No Significant Impact Related to the Construction and Operation of the Diablo Canyon Independent Spent Fuel Storage Installation (TAC No. L23399).* U.S. Nuclear Regulatory Commission. October 24, 2003. ADAMS Accession No. ML032970337 (package), ML032970370 (EA only).
12. *Issuance of Materials License No. SNM-2511 for the Diablo Canyon Independent Spent Fuel Storage Installation (TAC No. L23399).* U.S. Nuclear Regulatory Commission. March 22, 2004. ADAMS Accession No. ML040780107 (package).

13. Diablo Canyon Independent Spent Fuel Storage Installation License Application – Environmental Report, PG&E. December 2001 and Amendment 1, October 2002. ADAMS Accession Nos. ML020180196, ML020180173, ML022950304 (p.150-186).
14. Design Basis Threat, Final Rule, 10 C.F.R. Part 73, U.S. Nuclear Regulatory Commission. ADAMS Accession No. ML070520692.
15. U.S. Nuclear Regulatory Commission Report to Congress on the National Academy of Sciences Study on the Safety and Security of Commercial Spent Nuclear Fuel Storage, dated March 2005. ADAMS Accession No. ML050280428.
16. Nuclear Regulatory Commission Review of "Reducing the Hazards from Stored Spent Fuel in the United States," dated August 19, 2003. ADAMS Accession No. ML031260685.
17. "Protecting Our Nation – Since 9-11-01," U.S. Nuclear Regulatory Commission, NUREG/BR-0314, September 2004. ADAMS Accession No. ML042650352.
18. Homann, S.G., 1994: HOTSPOT Health Physics Codes for the PC, UCRL-MA-106315, Lawrence Livermore National Laboratory, California, and "Help" files included with Hotspot code. Available at <http://www.osti.gov/collections.html> (search for title).
19. ICRP Publication 30: Limits for Intakes of Radionuclides by Workers, Part 3, International Commission on Radiological Protection Pergamon Press, 1981.
20. ICRP Publication 71: Age-dependent Doses to Members of the Public from Intake of Radionuclides: Part 4: Inhalation Dose Coefficients, International Commission on Radiological Protection, Pergamon Press, 1996.
21. ICRP Publication 72: Age-Dependent Doses to Members of the Public from Intake of Radionuclides : Part 5 : Compilation of Ingestion and Inhalation Dose Coefficients, International Commission on Radiological Protection, Pergamon Press, 1996.

**ATTACHMENT B**

**Vaughn Index in the Matter of Pacific Gas and Electric Company,  
Independent Spent Fuel Storage Installation. Docket No. 72-26-ISFSI**

**Table 1 - Partially Redacted Documents, ADAMS Accession No. ML080440141 (package)**

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
<b>Document 1 - Results of a Large Airplane Impact into a Field of Holtec HI- STORM Spent Nuclear Fuel Storage Casks. ADAMS Accession No. ML080440139</b>	Analysis of response of HI-STORM cask to large airplane impact	p. 3a, p.4a, p. 4b, p.4c, p.4d, p.4e p. 5a,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.5b, p.5c, p.5d, p.6a	Ex.3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.7a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 8a, p. 8b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. 8c, p.9a, p.9b,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.9c-e p.10a-c p. 11a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 15a, p. 15b, p.16a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 16b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 18a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 18b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 18c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.18d, p. 18e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 18f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 18g, p. 19a, p. 19b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.19c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 19d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.19e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				circumventing the law.
		p. 20a, p. 20b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 20c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 20d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 21a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 22a, p. 22b, p. 23a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 23b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 23c, p. 23d,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				disclosure of which could aid an adversary in circumventing the law.
		p. 24a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 24b, p. 24c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 25a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 25b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 25c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 25d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 25e	Ex. 1	Classified under Executive Order 12,958 because it contains

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				information which if disclosed could aid an adversary in circumventing the law.
		p. 26a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 27a, p. 27 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 27c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 27d, p. 28a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 28b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 28c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 29a	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 29b, p. 30a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 30b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 30c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 31a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 31b, p. 31c, p. 31d, p. 32a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 32b, p. 33a, p. 33b, p. 33c, p. 34a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				the law.
		p. 34b, p. 34c, p. 34d, p. 35a, p. 35b, p. 35c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 35d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 35e, p. 35f, p. 36a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 36b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 36c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 36d, p. 36e, p. 36f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 37a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 38a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 38b, p. 39a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 39b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 39c, p. 39d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 40a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 40b, p. 41a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 41b	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 41c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 41d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 41e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 41f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 41g, p. 42a, p. 42b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 42c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 42.d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 43a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 43b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 43c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 44a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 44b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. 44c, p. 44d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 45a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 45b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 45c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 45d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 46a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 46b-f, p. 47a, p. 48a, p. 49a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 49e, p. 50a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 50b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 50c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 50d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 51a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 51b, p. 51c, p. 51d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 51e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 51f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 51g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 51h, p 52a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 52b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 52c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 52d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 53 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. 53b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 53c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 53d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 54a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 54b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 54c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 54d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				adversary in circumventing the law.
		p. 54e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 55a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 55b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 55c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 55d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 56a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 56b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

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				disclosure of which could aid an adversary in circumventing the law.
		p. 56c, p. 57a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 57b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 57c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 57d,	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 57e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 57f, p. 58a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

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				circumventing the law.
		p. 58b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 59 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 59b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 60a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 60b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 60c, p. 61a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 62a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				disclosure of which could aid an adversary in circumventing the law.
		p. 62b, p. 63a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 63b, p. 64a, p. 65a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 66a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 66b-c, p. 67a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 67c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 68a, p. 69a-b, p. 70a, p. 71a, p. 72a, p. 73a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 74a,	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

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				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 75a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 75b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 75c, p. 76a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 76b, p. 77a, p. 78a, p. 79a, p. 80a; p. 81a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 81 c-d, p. 82a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 82b, p. 83a, p. 84a, p. 85a-b,	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

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		p. 86a, p. 87a, p. 88a, p. 89a, p. 90a		would aid an adversary in circumventing the law.
		p. 90b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 90c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 90d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 90e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 90f	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 91a,	Ex. 3	Designated as Safeguards

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		p. 92 a, p. 92b		Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 92c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 93a-b, p. 94a, p. 95a, p. 95b, p. 95c, p. 96a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
Appendix A: Structural Analysis		p. A-2a-c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-3a, A-3b, A-3c, A-3d, A-3e	Ex 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-3f, A-4a, A-6a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-6b, A-6c, A-7a, A-8a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

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				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		P. A-8b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-9a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-9b, A-10a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-11a, A-11b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-11c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-12a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.

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		p. A-12b-d, p. A-13a-e, p. A-14a-f, p. A-16a-d, p. A-17a-b, p. A-18a-c, p. A-19a-g, p. A-20a-d, p. A-21a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-21d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-22a-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-22g, A-22h	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-23a, A-23b, A-23c, A-23d, A-23e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-24a, A-24b, A-24c, A-25a, A-25b, A-25c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-25d, A-26a, A-26b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

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		p. A-26c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-26d, A-26e, A-26f, A-27a, A-27b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-27c, A-28a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-28b, A-29a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-29b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-29c-d, p. A-30a, A-30b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-30c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-30d-e	Ex. 2	Internal NRC evaluations for

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		p. A-31a-c		potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-31d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-32a-g,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-33a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-33 b-d,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-33 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-34 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.



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		p. A-34b-c, p. A-35a-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-36a-c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-36d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-37a, A-37b, p. A-38a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-38b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-38c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-38d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

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				circumventing the law.
		p. A-39a, A-39b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-40a-e, p. A-41a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-42a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-42b-d, p. A-43a-c, p. A-44a-4c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-44d-e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-45a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-45e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				circumventing the law.
		A-45f	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-45g, p. A-46a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-46b-c, p. A-47a-b, p. A-48a-c, p. A-49a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-49b-d, p. A-51a-d, p. A-52a-c, p. A-53a-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-54a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-54c, p. A-55a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-55b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing

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				the law.
		p. A-55c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-55d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-56a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-56b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-56c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-56d, p. A-57a, A-57b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-57c	Ex. 1	Classified under Executive Order 12,958 because it contains

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				information which if disclosed could aid an adversary in circumventing the law.
		p. A-58a, A-58b, A-58c, A-58d, A-58e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-58f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-58g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-59a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-59b, A-59c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-60a-d, p. A-61a-e, p. A-62a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-62c	Ex. 1	Classified under Executive Order

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				12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-62d, p. A-63a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-63b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-63c	Ex. 2	Internal NRC analysis of security programs, the disclosure could aid an adversary in circumventing security arrangements.
		p. A-63d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-63e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-63f, p. A-64a, A-64b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-64c	Ex. 1	Classified under Executive Order

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				12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-64d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-65a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-65b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-65c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-65d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-65e, p. A-66a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-66b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				disclosure of which could aid an adversary in circumventing the law.
		p. A-66c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-66d-e p. A-67a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-67b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-67c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-68a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-68b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-69a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing



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				the law.
		p. A-69b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-69d, p. A-70a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-70b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-70c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-70d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-71a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-71c, p. A-72a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. A-72b, p. A-73a, p. A-74a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-74b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-74c, p. A-75a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-75b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-75c, p. A-76a-c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-76d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-77a,	Ex. 1	Classified under Executive Order

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		p. A-78a		12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-78b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-78c, p. A-79a, p. A-80a, p. A-81a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-82a-b, p. A-83a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-84a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-84b, p. A-86a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-86c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-86d	Ex. 2	Internal NRC evaluations for

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-86e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-86f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-87a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-87b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-87c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-88a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-88c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				aid an adversary in circumventing the law.
		p. A-88d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-89a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-89b-d, p. A-90a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-90c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-90d, p. A-91a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-91c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-91d, p. A-92a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

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		p. A-92b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-92c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-92d, p. A-93a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-93b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-93d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-94a-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-94g	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.

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		p. A-94h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-95a, p. A-96a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-97a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. A-98a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-100a-b, p. A-101a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
Appendix B: HI-STORM Storage Cask Engine Impact Analysis		p. B-1a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. B-1b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-1c, B-2a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-2b, p. B-11a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-11b, B-11c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-12a, p. B-12b, p.B-13a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-13b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-13c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				adversary in circumventing the law.
		p. B-13d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-13e, p. B-14a, p. B-14b, p. B-14c, p. B-15a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-19a, p. B-19b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-19c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-20a	Ex.3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-20b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. B-20c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-20d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-21a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-21b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-21c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-21d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-22a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-22b	Ex. 2	Internal NRC evaluations for

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-22c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-22d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-23a, p. B-23b, p. B-24a, p. B-24b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-25a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-25b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-25c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. B-25d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-25e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-25f, p. B-26a, p. B-26b, p. B-27a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-27b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-27c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-28a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-28b	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-28c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-28d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-29a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-29b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-29c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-29d	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-30a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-30b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-30c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-30d, p. B-31a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-31b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-31c, p. B-32a, p. B-	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		32b, p. B-33a, p. B-33b		Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-34a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-34b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-34c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-34d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-35a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-35b	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-35c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-35d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-36a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-36b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-36c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-36d,	Ex. 3	Designated as Safeguards



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. B-37a, p. B-37d, p. B-38a, p. B-38b		Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-39a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. B-39b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-39c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-39d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-39e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. B-39f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. B-40a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
Appendix C: Effect of Pool Fires on Dry Cask Storage	Effect of Pool Fires on Dry Cask Storage	p. C-1a, p. C-1b, p. C-1c, p. C-2a, p. C-2b, p. C-2c, p. C-3a, p. C-3b, p. C-3c, p. C-3d, p. C-4a, p. C-4b, p. C-4c, p. C-4d, p. C-5a, p. C-5b, p. C-6a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-6b, p. C-6c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-7a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-7b, p. C-7c, p. C-8a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-8b, p. C-8c, p. C-8d, p. C-10a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. C-10d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-10e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-11a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-11b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-11c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-11d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-12a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-12b-e	Ex. 2	Internal NRC evaluations for

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-13a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-13b-c, p. C-14a, p. C-15a-b, p. C-16a-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-17a-b, p. C-18a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-19a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-19d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. C-19e-g, p. C-20a-c, p. C-21a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-22a	Ex. 1	Classified under Executive Order 12,958 because it contains

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				information which if disclosed could aid an adversary in circumventing the law.
		p. C-22b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-22c,	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-22d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-23a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-23b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-23c-d p. C-24a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-24b, p. C-25a-c,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				adversary in circumventing the law.
		p. C-27a p. C-28a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-29a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-29d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-29e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-30a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-30b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-30c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. C-30d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-31a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-31b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-31c, p. C-32a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-32b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-32c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-32d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-33a	Ex. 1	Classified under Executive Order 12,958 because it contains

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				information which if disclosed could aid an adversary in circumventing the law.
		p. C-33b, p. C-34a-c, p. C-35a-b, p. C-36a-d, p. C-37a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-37b-c, p. C-38a, p. C-39a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-39b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-39c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-39d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-40a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-40b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				disclosure of which could aid an adversary in circumventing the law.
		p. C-40c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-40d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-41a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-41b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-41c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-41d, p. C-42a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-42b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				the law.
		p. C-42c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-42d, p. C-43a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-43b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. C-43c, p. C-44a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. C-46a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
<b>Document 2</b> "Response of the HI-STORM Spent Nuclear Fuel Storage Cask to a Large Explosive Charge Blast." ADAMS Accession No. ML080440144	Analysis of response of HI-STORM cask to large explosive blast.	p. 1a, p. 4a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.4b, p.5a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 6a p.7a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.8a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.8b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.9a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 9b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.9c-e p.10a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p.12a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 12b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.13 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.14a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.14b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.15a, p.17a, p. 17b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.17c, p.18a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.19a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.20a, p.20b, p.21 a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.21c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.22a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 22b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.23a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.23b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.24a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.24b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.24c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.24d, p.25a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.25b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				circumventing the law.
		p.26a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.26b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.27a, p.27b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.28a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.28b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.28c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.29a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.29b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.29c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.29d, p.29e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.30a, p.30b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.30c, p.31a, p.31b, p.31c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.32a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in



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				circumventing the law.
		p.32b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.32c, p.32d	Ex. 3	Designated as Safeguards Information; pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.32e, p.33a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.33b, p.33c, p.34a, p.34b, p.34c, p.35a, p.35b, p.36a, p.36b, p.37a, p.37b, p.37c, p.37d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.38a, p.38b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.38c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.38d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p.38e, p.38f, p.39a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.40a, p.40b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.40c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.40d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.40e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 40 f	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 40 g	Ex. 2	Internal NRC evaluations for

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				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.41a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.41b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.42a, p.42b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.42c, p.43a-b, p.44a, p.45a-d, p.46a, p.47a-c, p.48a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.48b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 48 c-d, p.49a-b, p.50a-d, p.51a-b, p.52a-b, p.53a, p.54a, p.55a, p.56a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 56b	Ex. 3	Designated as Safeguards

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				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.57a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.58a, p.59a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.59b, p.59c, p.59d, p.59e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.59f, p.60a, p.60b, p.60c, p.60d, p.60e, p.61a, p.61b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.61c, p.61d, p.61e, p.61f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.61g, p.62a, p.62b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

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				would aid an adversary in circumventing the law.
		p.62c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.62d, p.63a, p.63b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.63c	Ex 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.63d, p.64a, p.65a, p.65b, p.65c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.65d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.65e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.

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		p.66a, p.67a, p.68a, p.69a, p.69b, p.69c, p.69d, p.70a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.70b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.70c, p.70d, p.70e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.70f, p.70g	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.71a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.72a, p.72b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.73a, p.73b, p. 75a, p.76a, p.77a, p. A-1a,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

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		p.A-2a, p.A-2b, p.A-3a, p.B-1a, p.B-1b		disclosure of which could aid an adversary in circumventing the law.
		p.B-2a, p.B-3a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p.B-4a, p.B-4b, p.B-5a, p.B-6a, p.C-1a, p.C-1b, p.C-3a, p.C-4a, p.C-4b, p.C-5a, p.C-6a, p.D-1a, p.D-2a, p.D-3a, p.D-4a, p.D-5a, p.D-6a, p.D-7a, p.D-8a, p.D-9a, p.D-10a, p.D-11a, p.D-12a, .D-13a, p.D-14a	Ex. 2	Internal NRC analysis of security programs, the disclosure could aid an adversary in circumventing security arrangements.
<b>Document 3 –</b> NRC Spent Fuel Source Term Guidance Document. ADAMS Accession No. ML080440180	Analysis of spent fuel source terms for potential sabotage attack scenarios other than large airplane and large explosive blast.	p. 3 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 3 b, p. 4 a, p. 4 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 5 a-d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

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				circumventing the law.
		p. 5 e, p. 6 a, p. 7 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 7 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 7 c, p. 9 a-b p. 10 a-d, p. 11 a-d, p. 12 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 13 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 13 b, p. 14 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 14 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 14 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the



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				disclosure of which could aid an adversary in circumventing the law.
		p. 14 d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 14 e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 14 f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 15 a-g, p. 16 a-d, p. 17 a-d, p. 18 a-d, p. 19 a-b, p. 20 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 23 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 25 a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 26 a	Ex. 2	Internal NRC evaluations for

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				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 26 b, p. 27 a, p. 28 a, p. 29 a, p. 30 a, p. 31 a, p. 32 a, p. 33 a, p. 34 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 35 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 35 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 39 a, p. 40 a, p.41 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.41 c-d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p.41 e, p.42 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 42 b-c	Ex. 1	Classified under Executive Order 12,958 because it contains

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				information which if disclosed could aid an adversary in circumventing the law.
		p. 42 d-e, p. 43 a -d, p. 44 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 44 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 45 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 45 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 45 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 47a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 47 b	Ex. 1	Classified under Executive Order 12,958 because it contains

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				information which if disclosed could aid an adversary in circumventing the law.
		p. 47 c p. 48 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 48 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 48 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 48 d p. 49 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 49 b-f p. 50 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 50 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 51 a,	Ex. 2	Internal NRC evaluations for

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		p. 52 a-d		potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p.52 e-f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 52 g p. 53a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 53 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 53 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 53 d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 53 e-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 53 g, p. 54 a	Ex. 1	Classified under Executive Order 12,958 because it contains

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				information which if disclosed could aid an adversary in circumventing the law.
		p. 54 b-c, p. 55 a-b, p. 57 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 58 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 58 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 58 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 58 d, p. 59 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 59 b-e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 59 f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p. 60 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 60 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 61a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 61 b-c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 61 d-e, p. 62 a, p. 63 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 63 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 63 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p. 63 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 63 e-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 63 g, p. 64 a, p. 65 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 66 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 67 a, p. 68 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 68 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 69 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing



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				the law.
		p. 69 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 70 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 70 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 71 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 71 b-c, p. 72 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 72 d, p. 73 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 73 b, p. 75 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 75 d	Ex. 3	Designated as Safeguards

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				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 75 e-g p. 76 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 76 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 76 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 76 e, p. 77 a-c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 78 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 78 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p. 78 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 78 d, p. 79 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 79 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 79 d-f, p. 81 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 81 e-f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 81 g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 81 h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

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				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 81 i	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 82 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 82 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 83 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 83 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 83 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 83 d, p. 84 a	Ex. 1	Classified under Executive Order 12,958 because it contains

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				information which if disclosed could aid an adversary in circumventing the law.
		p. 84 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 84 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 85 a-d p. 87 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 87 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 87 d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 87 e, p. 88 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 88 b-d	Ex. 1	Classified under Executive Order 12,958 because it contains

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				information which if disclosed could aid an adversary in circumventing the law.
		p. 89 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 89 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 89 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 89 d-e p. 90 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 90 b-d, p. 91 a-d, p. 92 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 92 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 92 d, p. 93 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p. 93 b, p. 94 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 94 b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 94 d, p. 95 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 95 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 95 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 96 a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 96 c-e, p. 97 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

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				disclosure of which could aid an adversary in circumventing the law.
		p. 97 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 97 c, p. 98a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 98 e, p. 99 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 99 b-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 99 e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 99 f-h, p. 100 a-e, p. 101 a-b, p. 102 a-b, p. 103 a, p. 104 a-c, p. 105 a, p. 106 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.



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		p. 106 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 106 c-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 106 e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 106 f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 107 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 107 b, p. 108 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 108 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

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		p. 108 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 108 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 108e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 109 a, p. 110 a-c, p. 111 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 111 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 113 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 113 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 113 d-g,	Ex. 2	Internal NRC evaluations for

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		p. 115 a		potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 115 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 115 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 115 d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 115 e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 115 f, p. 116a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 116b, p. 117a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

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				circumventing the law.
		p. 117 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 118 a-b, p. 119 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 119 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 119 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 119 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 119 e-f, p. 121 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 121 c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing

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				the law.
		p. 121 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 121 e	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 121 f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 121 g	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 121 h, p. 122 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 122 b-c, p. 123 a-b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 124 a-b, p. 125 a, p. 126 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 126 b,	Ex. 1	Classified under Executive Order

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		p. 127 a-b		12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 127 c-d, p. 128 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 128 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 128 c-f, p. 129 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 129 b-c	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 129 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 129 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 130 a	Ex. 1	Classified under Executive Order

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				12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 130 b-e, p. 131 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 131 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 131 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 131 d	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 133 a-e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 134 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 134 b-c	Ex. 3	Designated as Safeguards

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				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. 136 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 136 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 137 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 137 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 138 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 138 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 139 a	Ex. 2	Internal NRC evaluations for



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				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 139 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 140 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. 140 b	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 141 a-b, p. 142 a-b, p. 143 a-e, p. 144 a-b, p. 145 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
NRC Spent Fuel Source Term Guidance Document – Appendix A	Threat Device Specifics	p. A-3 a,	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. A-4 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. A-4b	Ex. 1	Classified under Executive Order

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				12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
NRC Spent Fuel Source Term Guidance Document – Appendix B	Package Data/Basket Descriptions	p. B-3 a, p. B-4 a, p. B-5 a, p. B-6 a, p. B-7 a, p. B-8 a, p. B-9 a, p. B-10 a, p. B-11a, p. B-12 a, p. B-13 a, p. B-14 a, p. B-15 a, p. B-16 a, p. B-17 a, p. B-18 a, p. B-19 a, p. B-20a	Ex 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
NRC Spent Fuel Source Term Guidance Document – Appendix C	Spent Fuel Information	p. C-3 a, p. C-3 b	Ex 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
NRC Spent Fuel Source Term Guidance Document – Appendix D	Source Term Peer Review	p. D-2 a-o, p. D-3 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-5 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-6 a, p. D-7 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-7 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

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				would aid an adversary in circumventing the law.
		p. D-8 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		D-9 a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-9 c p. D-10 a-h p. D-11 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-11 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-11 c-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-11 h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-11 i-k	Ex. 2	Internal NRC evaluations for

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				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-11 l-m	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-11 n, p. D-12 a-e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-12 f, p. D-13 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-13 b-g p. D-14 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-14 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-14 d-f, p. D-15 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

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		p. D-15 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-15 c-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-15 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-15 f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-15 g	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-15 h-i p. D-16 a-e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-16 f p. D-17 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

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				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-17 b p. D-18 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-18 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-18 d-g p. D-19 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-19 d p. D-20 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-20 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-20 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.

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		p. D-21 a-e, p. D-23 a-e, p. D-24 a-c, p. D-25 a-b, p. D-26 a-b, p. D-28 a-d, p. D-29 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-29 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-29 c-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-29 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-29 f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-30 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-31 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

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				adversary in circumventing the law.
		p. D-31 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-31 d-h, p. D-32 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-32 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-33 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-33 c-d, p. D-34 a-f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-35 a-b, p. D-36 a-f, p. D-37 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-37 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC



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				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-37 d-f, p. D-38 a-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-38 g	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-38 h, p. D-39 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-40 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-40 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-40 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

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				circumventing the law.
		p. D-40 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-40 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-40 f, p. D-41 a-b,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-41 c-d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-41 e-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-41 h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-41 i, p. D-42 a, p. D-43 a-f, p. D-44a,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

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		p. D-45 a-c		disclosure of which could aid an adversary in circumventing the law.
		p. D-45 d-e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-45 f, p. D-46 a-e, p. D-47 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-47 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-47 f-h	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-47 i, p. D-48 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-48 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-48 c-d	Ex. 3	Designated as Safeguards

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				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-48 e-f, p. D-50 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-50 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-50 c, p. D-51 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-51 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-51 d-f, p. D-52 a-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-52 h-i	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

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				would aid an adversary in circumventing the law.
		p. D-52 j, p. D-53 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-53 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-53 d-i	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-53 j	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-53 k, p. D-54 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-54 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-54 e-f	Ex. 2	Internal NRC evaluations for

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				potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-54 g, p. D-55 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-55 b-i	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-55 j, p. D-56 a-c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-56 d-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-56 h, p. D-57 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-57 b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

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		p. D-57 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-57 e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-57 f-g	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-70 a, p. D-71 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-71 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-71 e-k, p. D-72 a-b, p. D-73 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-73 b, p. D-74 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential

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				vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-82 a-b, p. D-84 a-b, p. D-85 a, p. D-86 a, p. D-90 a-c, p. D-92 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-93 a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-93 c-h, p. D-94 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-94 c-d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-94 e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-94 f-g	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.



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		p. D-94 h, p. D-95 a-f, p. D-96 a-e, p. D-97 a-c, p. D-101 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-101 d-e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-101 f, p. D-102 a-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-102 h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-103 a-e, p. D-104 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-104 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-104 c-d, p. D-106 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				adversary in circumventing the law.
		p. D-106 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-106 c, p. D-107 a, p. D-108 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-108 d-e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-108 f, p. D-109 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-109 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-109 f, p. D-110 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-110 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-110 d-h	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-110 i	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-111 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-111 e, p. D-112 a-c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-112 d-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-112 h, p. D-113 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				circumventing the law.
		p. D-113 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-113 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-113 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-113 e-f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-114 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-114 b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-114 c, p. D-115 a-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				disclosure of which could aid an adversary in circumventing the law.
		p. D-115 d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-115 e-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-115 g-h	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-115 i	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-115 j	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-115 k, p. D-116 a-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-116 e, p. D-117 a	Ex. 3	Designated as Safeguards

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-117 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-117 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-117 d-g, p. D-118 a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-118 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-118 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-118 e	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				would aid an adversary in circumventing the law.
		p. D-118 f-g	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-118 h, p. D-119 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-119 b-d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law
		p. D-120 a-d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-120 e-f	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law
		p. D-121 a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
				Internal NRC evaluations for

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		p. D-121 b	Ex. 2	potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law
		p. D-121 c	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-121 d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		p. D-121 e-f	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		p. D-123 a	Ex. 6	Matters the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.
		p. D-125 a-e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law
NRC Spent Fuel Source Term Guidance Document – Appendix E	List of information on CD	p. 1 a, p. 1 b, p. 1 c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
	Confidential Sandia National Laboratory	p. 1 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
	memo and attachment			disclosure of which could aid an adversary in circumventing the law.
		p. 1 b, p. 2 a, p. 3 a, p. 4 a	Ex. 1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing the law.
		p. 5 a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
	Draft notes on CRUD Release and High Burnup Fuel	p. 4 a, p. 6 a, p. 6 b,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
	Analysis of 1985 Ruhmann KWU Data for SFR Estimates	Released in entirety		
	First Memo from Vigil and Steyskal to Yoshimura on modeling dated 5/23/2003	p. 1 a, p. 1 b, p. 1 c, p. 1 d, p. 1 e, p. 2 a, p. 2 b, p. 3 a, p. 3 b, p. 3 c, p. 4 a, p. 4 b, p. 5 a, p. 5 b, p. 5 c, p. 6 a, p. 6 b, p. 6 c, p. 7 a, p. 7 b, p. 8 a, p. 8 b, p. 9 a, p. 9 b, p. 9 c, p. 9 d, p. 10 a, p. 10 b, p. 10 c, p. 10 d, p. 11 a, p. 11 b, p. 11 c, p. 11 d, p. 12 a, p. 12 b, p. 12 c, p. 12 d, p. 13 a, p. 13 b, p. 13 c, p. 13 d, p. 14 a, p. 14 b, p. 15 a, p. 16 a, p. 16 b, p.	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
		17 a, p. 17 b, p. 18 a, p. 18 b, p. 19, p. 20 a, p. 21		
	Second Memo from Vigil and Steyskal to Yoshimura on modeling dated 5/23/2003	p. 1 a, p. 1 b, p. 2 a, p. 2 b, p. 2 c, p. 2 d, p. 2 e, p. 2 f, p. 2 g, p. 2 h, p. 3 a, p. 3 b, p. 3 c, p. 3 d, p. 3 e, p. 3 f, p. 3 g, p. 4 a, p. 4 b, p. 4 c, p. 5 a, p. 5 b, p. 6 a, p. 6 b, p. 7 a, p. 7 b, p. 7 c, p. 8 a, p. 8 b, p. 8 c, p. 9 a, p. 9 b, p. 9 c, p. 10 a, p. 10 b, p. 11 a, p. 11 b, p. 12 a, p. 12 b, p. 13 a, p. 13 b, p. 14 a, p. 14 b, p. 15 a, p. 15 b, p. 16 a, p. 16 b, p. 17 a, p. 17 b, p. 18 a, p. 18 b, p. 19 a, p. 19 b, p. 20 a, p. 21 a, p. 22 a, p. 22 b, p. 23 a, p. 23 b, p. 24 a, p. 24 b, p. 25 a, p. 25 b, p. 26 a, p. 26 b, p. 27 a, p. 27 b, p. 28 a, p. 28 b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
<b>Document 4 -</b> Memorandum from L. Reyes to the Commission, "Completion of Security Assessment of Spent Fuel Storage Casks for		1a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
Land-Based Terrorist," September 15, 2005. ADAMS Accession No. ML080440115				
<b>Document 5 -</b> Memorandum from L. Reyes to the Commission, "Completion of Security Assessment of the Crash of a Large Plane into Spent Fuel Storage Casks," September 15, 2005. ADAMS Accession No. ML080440116		2a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
<b>Document 6 -</b> Memorandum from J. Strosnider to R. Zimmerman, "Framework Assessments of Spent Fuel Storage Casks and Radioactive Material Transportation Packages," December 9, 2005. ADAMS Accession No. ML080440117	Security assessments of storage and transport designs for a variety of threats.	2a-f; 3a-b; 4a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
Enclosure 1, "Spent Fuel Storage Large	Security assessments of storage designs for a	1a-b, 2a-f, 3a-c,	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
Plane Assessment," to Memorandum from J. Strosnider to R. Zimmerman, "Framework Assessments of Spent Fuel Storage Casks and Radioactive Material Transportation Packages," December 9, 2005	large plane attack			disclosure of which could aid an adversary in circumventing the law.
		3d	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		3e	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		4a-b, 5a, 6a-d, 7a-d, 8a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		8b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		8d-e, 9a-c, 10a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		10b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		10c-d, 11a-c, 12a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		12b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		13a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		13b-c	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
Enclosure 2, "Spent Fuel Storage General Threat Framework Assessment," to Memorandum from J.	Security assessments of storage designs for land based threats	1a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
Strosnider to R. Zimmerman, "Framework Assessments of Spent Fuel Storage Casks and Radioactive Material Transportation Packages," December 9, 2005				
		1b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		1c-d, 2a-e, 3a-f, 4a	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		4b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		4c,d	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		4e-f, 5a-c, 6a,7a-b	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
				would aid an adversary in circumventing the law.
		7c, 8a, 9a-b, 10a-b, 11a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		11c-f, 12a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		12b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
		12c, 13a	Ex. 3	Designated as Safeguards Information, pursuant to 42 USC 2167, identifies potential vulnerabilities which if disclosed would aid an adversary in circumventing the law.
		13b-d, 14a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
Enclosure 3, "Spent Fuel Transportation General Threat Framework Assessment"		Entire enclosure		Not relied upon by the NRC Staff in developing the EA.
Enclosure 4, "Radioactive Material		Entire enclosure		Not relied upon by the NRC Staff in developing the EA.

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
Transportation General Threat Framework Assessment"				
Enclosure 5, "Inventory of Sandia National Laboratories Reports Prepared for the Spent Fuel Project Office Framework Assessment"				Released in its entirety
Enclosure 6 (title redacted)		1a-c, 2a, 3a, 4a, 5a, 6a-b	Ex. 2	Internal NRC evaluations for potential vulnerabilities, the disclosure of which could aid an adversary in circumventing the law.
<b>Document 7 –</b> Staff Requirements-SECY-04-0222-Decisionmaking Framework for Materials and Research and Test Reactor Vulnerability Assessments"  ADAMS Accession No. ML080440118	Commission direction to staff regarding implementation of the Framework	3-page memorandum released in its entirety		
<b>Document 8 -</b> "Decision-Making Framework for Materials and Research and Test Reactor Vulnerability	Staff recommendation to a methodology to be used for assessing potential vulnerabilities	p.5, Para 3  Para 4	Ex. 2	Internal NRC analysis of specific security feature which would possibly aid an adversary if disclosed.



Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
Assessments SECY-04-0222"  ADAMS Accession No. ML080440119				
Attachment 1-Threat Assessment for Non-Power Reactors and Non-Category I Fuel Cycle Facilities	Classified Threat Assessment	Other than title, redacted in its entirety	Ex1	Classified under Executive Order 12,958 because it contains information which if disclosed could aid an adversary in circumventing security arrangements.
Attachment 2 – Framework Methodology	NRC Staff guidance for using the framework methodology to estimate potential consequences	p.3	Ex. 2	Internal NRC analysis of security measures and potential vulnerabilities which if disclosed could aid an adversary.
Attachment 5	Application of the Decision Making Framework to a Postulated Security Event at a Research Reactor	p. 1-15	Ex. 3	Designated as Safeguards Information pursuant to 42 U.S.C. § 2167 that specifically identifies security measures and potential vulnerabilities which would aid an adversary if disclosed.
Attachment 6	Application of the Decision Making Framework to a Postulated Security Event Scenario at a	p. 1-9	Ex. 3	Designated as Safeguards Information pursuant to 42 U.S.C. § 2167 that specifically identifies security measures and potential vulnerabilities which would aid an

Document Name	Document Summary	Location of Redaction	FOIA Exemption	Justification for Withholding Information
	Fuel Cycle Facility			adversary if disclosed.
<b>Document 9 –</b>  In the Matter of Pacific Gas and Electric, Diablo Nuclear Power Plant Independent Spent Fuel Storage Installation, Order Modifying License (Effective Immediately).  ADAMS Accession No. ML080440120	Order imposing compensatory measures on ISFSI licensees and attached "Interim Compesatory Measures for Dry Independent Spent Fuel Storage Installations.	Attachment 1 –  1.a-d, p.2.a-e, 3.a-d, 4.a-e, 5.a-d, 6.a-d	Ex. 3	Designated as Safeguards Information pursuant to 42 U.S.C. § 2167 that specifically identifies security measures and potential vulnerabilities which would aid an adversary if disclosed.

**Table 2 - Documents Publicly-Available in their Entirety**

Document Name	ADAMS Accession Number (applicable only to NRC documents)
1. "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs." NUREG-1748. U.S. Nuclear Regulatory Commission. August 2003.	ADAMS Accession No.  ML032450279
2. <i>Environmental Assessment and Finding of No Significant Impact Related to the Construction and Operation of the Diablo Canyon Independent Spent Fuel Storage Installation (TAC No. L23399).</i> U.S. Nuclear Regulatory Commission. October 24, 2003.	ADAMS Accession No.  ML032970337 (package)

	ML032970370 (EA only)
3. <i>Issuance of Materials License No. SNM-2511 for the Diablo Canyon Independent Spent Fuel Storage Installation</i> (TAC No. L23399). U.S. Nuclear Regulatory Commission. March 22, 2004.	ADAMS Accession No. ML040780107 (package)
4. Diablo Canyon Independent Spent Fuel Storage Installation License Application – Environmental Report, PG&E. December 2001 and Amendment 1, October 2002.	ADAMS Accession Nos. ML020180196, ML020180173 ML022950304 (p.150-186).
5. Design Basis Threat, Final Rule, 10 CFR Part 73, USNRC, dated March 13, 2007.	ADAMS Accession No. ML070520692
6. U.S. Nuclear Regulatory Commission Report to Congress on the National Academy of Sciences Study on the Safety and Security of Commercial Spent Nuclear Fuel Storage, dated March 2005.	ADAMS Accession No. ML050280428
7. Nuclear Regulatory Commission (NRC) Review of "Reducing the Hazards from Stored Spent Fuel in the United States," dated August 19, 2003.	ADAMS Accession No. ML031260685
8. "Protecting Our Nation – Since 9-11-01," U.S. Nuclear Regulatory Commission, NUREG/BR-0314, September 2004.	ADAMS Accession No. ML042650352

9. Homann, S.G., 1994: HOTSPOT Health Physics Codes for the PC, UCRL-MA-106315, Lawrence Livermore National Laboratory, California, and "Help" files included with Hotspot code.	<a href="http://www.osti.gov/collections.html">http://www.osti.gov/collections.html</a> (search on title)
10. ICRP Publication 30: Limits for Intakes of Radionuclides by Workers, Part 3, International Commission on Radiological Protection Pergamon Press, 1981.	
11. ICRP Publication 71: Age-dependent Doses to Members of the Public from Intake of Radionuclides: Part 4: Inhalation Dose Coefficients, International Commission on Radiological Protection, Pergamon Press, 1996.	
12. ICRP Publication 72: Age-Dependent Doses to Members of the Public from Intake of Radionuclides : Part 5 : Compilation of Ingestion and Inhalation Dose Coefficients,. International Commission on Radiological Protection, Pergamon Press, 1996.	

February 13, 2008

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of )

PACIFIC GAS AND ELECTRIC COMPANY )

(Diablo Canyon Power Plant Independent  
Spent Fuel Storage Installation) )

Docket No. 72-26-ISFSI

ASLBP No. 08-860-01-ISFSI-BD01

AFFIDAVIT OF JAMES RANDALL HALL

I, James Randall Hall, do hereby state as follows:

1. I am employed as a Senior Project Manager in the Division of Spent Fuel Storage and Transportation in the Nuclear Regulatory Commission's Office of Nuclear Material Safety and Safeguards. I serve as the project manager for the Diablo Canyon Independent Spent Fuel Storage Installation.

2. I hereby certify that all relevant materials required to be disclosed pursuant to the Commission's January 15, 2008 Memorandum and Order in the above-captioned proceeding have been disclosed, and that the disclosures are accurate and complete.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

*/Original Signed By/*

\_\_\_\_\_  
James Randall Hall

Executed in Rockville, MD  
this 13<sup>th</sup> day of February, 2008

February 13, 2008

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of )

PACIFIC GAS AND ELECTRIC COMPANY )

(Diablo Canyon Power Plant Independent  
Spent Fuel Storage Installation) )

Docket No. 72-26-ISFSI

ASLBP No. 08-860-01-ISFSI-BD01

AFFIDAVIT OF JOSEPH RIVERS

I, Joseph Rivers, do hereby state as follows:

1. I am employed as the Senior Level Advisor on Security for the Division of Security Policy, Office of Nuclear Security and Incident Response. I have more than 20 years of experience in nuclear security. I also have more than 10 years of experience as an Authorized Derivative Classifier and Authorized Derivative Declassifier in the Department of Energy and the Nuclear Regulatory Commission.
2. As part of their responsibilities in preparing the document disclosures for this proceeding, NRC staff members reviewed all of the unclassified portions of documents line-by-line and identified information which should be withheld from public disclosure pursuant to Freedom of Information Act (FOIA), 5 U.S.C. § 552, exemptions.
3. I have personally reviewed "Results of a Large Impact into a Field of Holtec HI-STORM Spent Nuclear Fuel Storage Casks," Smith, J.A., et al., Sandia National Laboratories, and have determined that the Staff properly invoked FOIA exemptions to withhold information which cannot be made public in the interest of national security.
4. I have determined that disclosure of the withheld information would cause harm to the public health and safety as it would provide information which could aid an adversary in circumventing the law by sabotaging an Independent Spent Fuel Storage Installation.
5. Further, I have determined that all information reasonably segregable from information exempt from disclosure has been disclosed.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

***/Original Signed By/***

\_\_\_\_\_  
Joseph Rivers

Executed in Rockville, MD  
this 13<sup>th</sup> day of February, 2008

February 13, 2008

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	Docket No. 72-26-ISFSI
	)	
(Diablo Canyon Power Plant Independent	)	ASLBP No. 08-860-01-ISFSI-BD01
Spent Fuel Storage Installation)	)	

AFFIDAVIT OF BERNARD STAPLETON

I, Bernard Stapleton, do hereby state as follows:

1. I am employed as the Senior Program Manager for the Safeguards Information program at the Nuclear Regulatory Commission (NRC). I have worked in this capacity for five years. I am also an authorized NRC classifier and have authored several guidance documents involving Safeguards Information and classified topics. Prior to joining the NRC, I worked as a National Security Advisor in the Department of Energy's classification office. I have also represented the NRC staff before several Atomic Safety Licensing Board hearings on information security and spoken before the Federal Appeals Board on information protection on behalf of the Department of Justice.
2. As part of their responsibilities in preparing the document disclosures for this proceeding, NRC staff members reviewed all of the unclassified portions of documents line-by-line and identified information which should be withheld from public disclosure pursuant to Freedom of Information Act (FOIA), 5 U.S.C. § 552, exemptions.
3. I have personally reviewed all of the documents in Attachment A except "Results of a Large Impact into a Field of Holtec HI-STORM Spent Nuclear Fuel Storage Casks," which Joseph Rivers reviewed, and have determined that the Staff has properly invoked FOIA exemptions to withhold information which cannot be made public in the interest of national security.
4. I have determined that disclosure of the withheld information would cause harm to the public health and safety as it would provide information which could aid an adversary in circumventing the law by sabotaging an Independent Spent Fuel Storage Installation.
5. Further, I have determined that all information reasonably segregable from information exempt from disclosure has been disclosed.

6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

***/Original Signed By/***

\_\_\_\_\_  
Bernard Stapleton

Executed in Rockville, MD  
this 13<sup>th</sup> day of February, 2008



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of )

PACIFIC GAS & ELECTRIC CO. )

(Diablo Canyon Power Plant Independent  
Spent Fuel Storage Installation) )

Docket No. 72-26-ISFSI

ASLBP No. 08-860-01-ISFSI-BD01

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S RESPONSE TO COMMISSION ORDER TO PROVIDE REFERENCE LIST AND VAUGHN INDEX" in the above-captioned proceedings have been served on the following by deposit in the United States mail; through deposit in the Nuclear Regulatory Commission's internal system as indicated by an asterisk (\*), and by electronic mail as indicated by a double asterisk (\*\*) on this 13<sup>th</sup> day of February, 2008.

E. Roy Hawken \* \*\*  
Chief Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Mail Stop: T 3-F23 \*  
Washington, D.C. 20555

Diane Curran, Esq. \*\*  
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February 20, 2008

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE COMMISSION

In the matter of  
Pacific Gas and Electric Company  
Diablo Canyon Nuclear Power Plant  
Unit Nos. 1 and 2  
Independent Spent Fuel Storage Installation

Docket # 72-26

**SAN LUIS OBISPO MOTHERS FOR PEACE'S  
RESPONSE TO NRC STAFF'S VAUGHN INDEX,  
REQUEST FOR LEAVE TO CONDUCT DISCOVERY  
AGAINST THE NRC STAFF,  
REQUEST FOR ACCESS TO UNREDACTED REFERENCE  
DOCUMENTS, AND REQUEST FOR PROCEDURES  
TO PROTECT SUBMISSION OF SENSITIVE INFORMATION**

**I. INTRODUCTION**

Pursuant to CLI-08-01, the U.S. Nuclear Regulatory Commission's ("NRC's" or "Commission's") Memorandum and Order of January 15, 2008, San Luis Obispo Mothers for Peace ("SLOMFP") hereby responds to the Vaughn Index submitted by the NRC Staff on February 13, 2008.

As discussed below, the Vaughn Index is both incomplete and inadequate to justify the withholding of portions of documents cited as references for the Supplement to the Environmental Assessment and Final Finding of No Significant Impact Related to the Construction and Operation of the Diablo Canyon Independent Spent Fuel Storage Installation (August 2007) ("Final EA Supplement"). In addition, what little information is provided indicates that in at least one instance, the NRC is unlawfully withholding "secret law" rather than legitimately protecting law-enforcement related documents under the Freedom of

Information Act ("FOIA"). *Hardy v. Bureau of Alcohol, Tobacco & Firearms*, 631 F.2d 653, 657 (9th Cir. 1980).

SLOMFP respectfully submits that the paucity of information disclosed by the Staff in the set of redacted reference documents that it publicly released on February 13, 2008, warrants reconsideration by the Commission of its earlier refusal to grant SLOMFP access to the reference documents under a protective order. Consistent with the Atomic Energy Act and longstanding Commission policy, the Commission should grant SLOMFP access to the reference documents under a protective order, in order to ensure that SLOMFP has a meaningful right to a hearing under Section 189a of the Atomic Energy Act, 42 U.S.C. § 2239(a).

Finally, SLOMFP requests an opportunity to make additional discovery requests to the NRC Staff, based on the information provided in the set of redacted documents produced by the NRC Staff. The subject matter of the discovery requests is described in Sections II through IV below.

## **II. THE VAUGHN INDEX IS INCOMPLETE.**

Based on the information provided in the NRC Staff's Vaughn Index, it appears that other relevant documents should have been included in the index of reference documents.

### **A. The Vaughn Index Does Not Explain the Applicability of SECY-04-0222 or Cite an Alternative Decision-making Framework for Vulnerability Assessments.**

The NRC lists, as a reference document for the Final EA Supplement, SECY-04-0222, Memorandum from Luis A. Reyes to the Commissioners re: Decision-making Framework for Materials and Research and Test Reactor Vulnerability Assessments (November 24, 2004) ("SECY-04-0222") (Document 8). This document confirms that for materials and research and

test reactor vulnerability assessments, the NRC Staff screens out attacks whose consequences do not result in immediate fatalities. *Id.* at 4.

By its own terms, SECY-04-0222 appears not to apply to ISFSIs. In its response to comments on the Draft EA Supplement, the Staff also stated that it "did not consider early fatalities as a measure of environmental impact." Final EA Supplement at A-6. Thus, the question arises: why did the Staff list SECY-04-0222 as reference document? Is there some other document that makes the decision-making framework in SECY-04-0222 applicable to ISFSIs?

SECY-04-0222 states that there are "various points of view within the [NRC] staff on the need for additional criteria [besides early fatalities], e.g., land contamination." *Id.* at 5. In its response to Contention 2, the Staff also claimed to consider "other factors" besides early fatalities. NRC Staff's Answer to Contentions Submitted by San Luis Obispo Mothers for Peace at 19 (July 13, 2007). Surely the NRC has documentation of these differing points of view and "other factors" that were appropriate to consider in the EA Supplement.

SECY-04-0222 also states that its "proposed decision-making framework does not include Category 1 fuel cycle facilities or nuclear power plants," which are "required to successfully protect against capabilities described in a design basis threat." *Id.* at 3. SECY-04-0222 also states that "[c]onsequently, these facilities will not be subjected to the additional screening process called for in the decision-making framework." *Id.* Nothing in the Final EA Supplement or any of the references indicates whether the NRC Staff considers the Diablo Canyon ISFSI to be subject to the nuclear power plant DBT [design basis threat] for purposes of the Staff's analysis of environmental impacts; nor do these documents state what is meant by "the additional screening criteria." This should be clarified by the Staff.

The Staff should be required to identify any other documents, besides SECY-04-0222, which contain applicable criteria for determining whether the environmental consequences of an intentional attack on the Diablo Canyon SFSI are significant, including differing staff opinions. If, in fact, SECY-04-0222 is the only guidance document on which the Staff relied, it should be required to clarify that point.

**B. The Vaughn Index Does Not Identify Input From Other Agencies.**

In Document 7, Memorandum from Annette Vietti-Cook, NRC Secretary, to Luis A. Reyes, NRC Executive Director for Operations re: Staff Requirements -- SECY-04-0222 -- Decision-making Framework for Materials and Research and Test Reactor Vulnerability Assessments (January 15, 2005), the Secretary of the Commission instructed the Staff:

As a separate issue from the vulnerability assessment conducted under the decision making framework, the staff should not be independently developing criteria and standards for other consequences (such as land contamination and economic impacts) at this time. Rather, consistent with the U.S. Government programs for homeland protection and security, the staff should continue to support the separate vulnerability assessment reviews being conducted under the leadership of the Department of Homeland Security (DHS). These activities include the consideration of consequences other than prompt fatalities.

*Id.* at 3. The SRM also instructed the Staff to "keep the Commission appropriately informed of progress of this activity and, at the appropriate time, make recommendations to the Commission if the existing NRC consequence criteria or methodologies for future vulnerability assessments should be modified." *Id.*

More than three years have passed since the SRM was written. At this point, it is reasonable to expect that the NRC Staff's participation in the DHS analysis of accident consequences would have yielded some insights into the question of whether and how consequences not involving immediate fatalities should be considered. Yet, the Vaughn Index contains no such information. SLOMFP requests the opportunity to question the Staff regarding

the results of the DHS analytical process in which the Staff participated and its relevance to the consideration of the environmental impacts of licensing the Diablo Canyon ISFSI.

Finally, SECY-04-0222 states that the process of developing the decision-making criteria "has been informed by several independent comprehensive VA methodologies including but not limited to the Risk Analysis and Management for Critical Assets Protection (RAMCAP) methodology developed by the American Society of Mechanical Engineers (ASME), for the U.S. Department of Homeland Security (DHS)." *Id.* at 2. SECY-04-0222 also states that the NRC's decisionmaking framework is "consistent with the RAMCAP guidance" in that "scenarios resulting in no prompt fatalities are screened out and are not put through the framework decision-making process." *Id.* at 4. Thus, the RAMCAP methodology appears to be highly relevant to the NRC's analysis of the environmental impacts of an attack on the Diablo Canyon ISFSI, but has not been included as a reference document. SLOMFP seeks an opportunity to question the Staff regarding the relevance of this document.

**III. THE NRC STAFF HAS FAILED TO ADDRESS SOME WITHHELD PORTIONS OF SECY-04-0222 IN THE VAUGHN INDEX OR JUSTIFY ITS DECISION TO WITHHOLD WHAT APPEARS TO BE "SECRET LAW."**

The NRC Staff has withheld from disclosure significant portions of SECY-04-0222 (Document 8), on the grounds that the information is exempt from disclosure under Exemption 1, 2, or 3 of the FOIA. Vaughn Index at 130-131. Redacted portions of the document are covered with black ink or whited out. For each part of SECY-04-022 that is blacked out or whited out, the Vaughn Index purports to identify a FOIA exemption and provide a "Justification for Withholding Information." But the Vaughn Index does not identify or provide justifications for withholding of all of the redacted portions of the document:

- In two places on page 5 of SECY-04-0222, the NRC Staff has whited out what appear to be short phrases that follow the words "radioactive materials." The justification given for these exclusions from the text is that they contain "[i]nternal NRC analysis of specific security feature which would possibly aid an adversary if disclosed." Vaughn Index at 130. But the context of the withheld information indicates that the information is used to assist the NRC Staff in making a determination of whether the release of radioactive materials would cause significant adverse effects and thereby are worthy of consideration in an environmental analysis. Thus, the NRC Staff appears to be withholding "secret law" that should have been disclosed under the FOIA. *Hardy*, 631 F.2d at 657.
- On page 1 of Attachment 2, the NRC Staff has blacked out portions of Figure 1, entitled "Decision Matrix." But the Vaughn Index has no corresponding entry for information on page 1 of Attachment 2. The omission is a matter of concern because Figure 1 appears to establish "secret law" by setting the guidelines by which the NRC will decide whether consequences of intentional attacks are significant. *Hardy*, 631 F.2d at 657. Under *Hardy*, the NRC does not have a legitimate claim to withhold such secret laws under the FOIA.
- On page 2 of Attachment 2, the text refers to Table 1, entitled "Activity-Specific Attractiveness Category Ranking Matrix." Neither the title nor the text of Table 1 appears on page 2 or 3 of SECY-04-0222, and the Vaughn Index makes no reference to Table 1. While page 3 of SECY-04-0222 is blacked out in its entirety, with a corresponding entry in the Vaughn Index, the Vaughn Index describes the blacked out language as: "NRC Staff guidance for using the framework methodology to estimate potential consequences." *Id.* at 131. That description that is not consistent with the title



of Table 1, which describes a ranking matrix for attractiveness. Thus, it appears the Staff has withheld Table 1 without attempting to justify the withholding decision. As with Figure 1, the Staff appears to have excised, without justification, a portion of SECY-04-0222 that constitutes "secret law" regarding the NRC's standards for recognizing the effects of intentional attacks as significant. *Hardy*, 631 F.2d at 657.

**IV. THE COMMISSION SHOULD RECONSIDER ITS CATEGORICAL REFUSAL TO ALLOW SLOMFP TO REVIEW WITHHELD INFORMATION UNDER A PROTECTIVE ORDER.**

In CLI-08-01, the Commission categorically refused to provide SLOMFP with access, under a protective order, to any documents that the NRC considers to be exempt from disclosure under the FOIA. *Id.*, slip op. at 18, citing *Weinberger v. Catholic Action of Hawaii*, 454 U.S. 139, 143 (1981). While the Commission ordered the Staff to identify and release all non-exempt information in the reference documents, very little meaningful information has been provided in the material that was publicly released on February 13. Thus, access to the redacted versions of the reference documents has not allowed SLOMFP to understand the reasons for the Staff's conclusion that the environmental impacts of an intentional attack on the Diablo Canyon ISFSI would be insignificant.

For example, based on the limited information that has been disclosed in SECY-04-0222, it now appears that the Staff did, indeed, screen out as unworthy of consideration any attack scenarios that would have resulted in consequences other than early fatalities. See discussion above in Section II.A. However, so much information has been withheld about the Staff's decision-making criteria that it is not clear how the Staff arrived at its conclusion, or even whether the Staff did indeed apply the decision-making matrix in SECY-04-222 to the Diablo Canyon ISFSI. The Staff also withheld large portions of relevant documents that would have

allowed SLOMFP to determine whether the Staff was aware of, but discarded, credible scenarios that would have resulted in significant environmental impacts other than early fatalities. Such documentary material would have allowed SLOMFP to test the thesis of Contention 2 that the Staff arrived at its conclusion of "no significant impacts" by arbitrarily screening out any attack scenarios that did not result in early fatalities.

Now that the Staff has released the Vaughn Index and the set of redacted reference documents, it is clear that the released information is insufficient to allow SLOMFP the meaningful hearing to which SLOMFP is entitled under Section 189a of the Atomic Energy Act, 42 U.S.C. § 2239(a), regarding the question of whether the NRC has complied with the National Environmental Policy Act ("NEPA") in proposing to license the Diablo Canyon ISFSI.

As the Commission has long recognized, the use of protective orders is an appropriate way to assure that interested parties will receive a meaningful hearing in licensing cases, and at the same time protect classified information, safeguards information, proprietary information and other sensitive information. *See, e.g., Pacific Gas and Electric Company* (Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2), CLJ-80-24, 11 NRC 775, 777 (1980). In that case, the Commission rejected an argument by the license applicant, PG&E, that the physical security plan for the proposed Diablo Canyon nuclear plant "should not be made available to petitioners because the best method of preventing disclosure of this sensitive document is to make it available to the fewest number of individuals possible." 11 NRC at 777. As the Commission explained:

The Commission recognizes PG&E's concern, but emphasizes that intervenors in Commission proceedings may raise contentions relating to the adequacy of the applicant's proposed physical security arrangements, and that the Commission's regulations, 10 C.F.R. 2.790, contemplate that sensitive information may be turned over to intervenors in NRC proceedings under appropriate protective orders.

11 NRC at 777 (footnotes omitted).<sup>1</sup> Consistent with the Atomic Energy Act and the Commission's longstanding policy, the Commission should apply its regulations in 10 C.F.R. § 2.390 to allow SLOMFP access to the reference documents under a protective order.

SLOMFP also respectfully submits that the Commission's suggestion that the reference documents qualify as privileged "state secrets," *see* CLI-08-01, slip op. at 24 and n.97, citing *United States v. Reynolds*, 345 U.S. 1, 11 (1953), is undermined by the agency's general practice of broadly circulating security-related documents for comment to outside parties, including nuclear industry trade representatives and state and local government representatives. For instance, in a November 5, 2001, letter, NRR Director Samuel J. Collins informed a senior official at the Nuclear Energy Institute ("NEI") that NEI employee Ronald Rose could not only "receive and store" safeguards information at an NEI facility, but that he could share it with unnamed NEI personnel; and that no further NRC authorization was needed for the distribution of the safeguards information by Mr. Rose. Letter from Samuel J. Collins, NRR, to Ralph

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<sup>1</sup> The Commission also noted that the regulations in 10 C.F.R. 2.790 [now codified at 10 C.F.R. § 2.390] "are consistent with the policy set forth in Section 181 of the Atomic Energy Act." *Id.* Section 181 provides that:

[I]n the case of agency proceedings or actions which involve Restricted Data, defense information, safeguards information protected from disclosure under the authority of section 2167 of this title or information protected from dissemination under the authority of section 2168 of this title, the Commission shall provide by regulation for such parallel procedures as will effectively safeguard and prevent disclosure of Restricted Data, defense information, such safeguards information or information protected from dissemination under the authority of section 2168 of this title to unauthorized persons with minimum impairment of the procedural rights which would be available if Restricted Data, defense information, such safeguards information or information protected from dissemination under the authority of section 2168 of this title were not involved.

42 U.S.C. § 2231. Thus, the Atomic Energy Act contemplates that the NRC will establish "parallel procedures" that will protect classified and safeguards information and at the same time allow meaningful hearings.

Beedle, NEI (November 5, 2001) [ADAMS Accession No. ML013090038].<sup>2</sup> The Commission itself has granted need-to-know status to NEI officials, for the general purpose of "efficiently and expeditiously obtaining industry-wide comments on Commission policy issues involving nuclear facility and materials security." Letter from Nils J. Diaz, NRC Chairman, to Joe F. Colvin, NEI President and Chief Executive Officer (June 19, 2003) [ADAMS Accession No. ML031480365]. As noted with approval in a September 17, 2003, NRC Staff letter to NEI, as of September 2003, the NRC Staff began to hold "weekly" closed meetings with NEI and other nuclear industry representatives, "to discuss security, contingency, and training and qualification plan changes needed to support compliance with the April 29, 2003, design basis threat order." Letter from Roy P. Zimmerman via Michael F. Weber, NRC Office of Nuclear Security and Incident Response Operations, to Joe F. Colvin, President and Chief Executive Officer, NEI (September 17, 2003). The letter also emphasizes that the Commission "is committed to the continued exchange of information and ideas between the NRC and authorized stakeholders on security topics." *Id.* at 1.

Similarly, the NRC has announced that before imposing "enhancements" to the DBT in 2003 enforcement orders, it "solicit[ed] and receive[ed] comments from Federal, State, and local agencies, and industry stakeholders." Final Rule, Design Basis Threat, 72 Fed. Reg. 12,705 (March 19, 2007). Neither the contents of the orders or the details of the DBT rule were made available to the general public.

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<sup>2</sup> On January 23, 2003, the Staff also noticed a closed meeting on the revised DBT, to which NEI employees and other "to be determined" members of the nuclear industry were invited to discuss safeguards issues. NRC Meeting Notice re: Closed Meeting to Discuss Questions and Responses from the January 9, 2003, Design Basis Threat (DBT) Meeting and Requested Written Input Provided by Representatives from Licensed Power Reactor Facilities, the Nuclear Industry, and State and Federal Agencies (January 23, 2003) (attached as Exhibit 2).

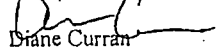
It is not evident from the Vaughn Index or the redacted reference documents how many outside entities have reviewed those documents in an unredacted state, or what has been the NRC's policy for sharing them with outside entities. Before declaring that the documents are privileged "state secrets," the NRC Staff should be required to fully disclose the identities of the persons and organizations with which those documents have been shared and the agency's policy for sharing them. And if the NRC Staff's disclosures show that the documents have been shared with PG&E, trade industry representatives, or state and local government officials, and other "stakeholders," the Commission should also ensure that SLOMFP has access to the documents for purposes of participating in the Diablo Canyon ISFSI licensing proceeding.

Accordingly, SLOMFP requests that the Commission make unredacted versions of the reference documents available to SLOMFP under a protective agreement. SLOMFP also requests that the Commission establish a procedure by which SLOMFP can share sensitive information with the NRC in a protected setting. For instance, SLOMFP has information responsive to discovery requests by the NRC which it does not believe should be publicly released.

#### V. CONCLUSION

For the foregoing reasons, the Staff's Vaughn Index is inadequate to justify the Staff's decision to withhold information from SLOMFP under the FOIA. In addition, SLOMFP should be permitted to ask additional discovery questions to the NRC Staff regarding information that was disclosed in the redacted documents. The Commission should also grant SLOMFP's renewed request for access to the reference documents under a protected order. Finally, the Commission should establish procedures that would allow the consideration of sensitive information submitted by SLOMFP in a protected setting.

Respectfully submitted,

  
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