

Southern Nuclear Operating Company

ND-18-1047

Enclosure 2

**Redacted COL Operational Programs and
Other License Conditions Implementation Schedule**

(This Enclosure consists of 6 pages, including this cover page)

Enclosure 2 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4

Combined License (COL) Operational Programs and Other License Conditions Implementation Schedule Redacted Version

| COL Reference FSAR Reference | Program Name | Implementation Date |
|--|--|----------------------------|
| <u>02.D.(11)</u> N/A | Unit 3 Initial Fuel Load | [] |
| <u>02.D.(11)</u> N/A | Unit 4 Initial Fuel Load | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 1 | Unit 3 Inservice Inspection | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 1 | Unit 4 Inservice Inspection | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 2 | Inservice Testing | [] |
| <u>02.D.(10)(a) and 02.D.(11)</u> Table 13.4-201 Item 3 | Environmental Qualification | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 4 | Unit 3 Preservice Inspection | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 4 | Unit 4 Preservice Inspection | [] |
| <u>02.D.(10)(b) and 02.D.(11)</u> Table 13.4-201 Item 5 | Reactor Vessel Material Surveillance | [] |
| <u>02.D.(10)(c) and 02.D.(11)</u> Table 13.4-201 Item 6 | Preservice Testing | [] |
| <u>02.D.(10)(d) and 02.D.(11)</u> Table 13.4-201 Item 7 | Containment Leakage Rate Testing | [] |
| <u>02.D.(10)(e)1. and 02.D.(11)</u> Table 13.4-201 Item 8 | Fire Protection - Designated Storage Areas (per RG 1.189) | [] |
| <u>02.D.(10)(e)2. and 02.D.(11)</u> Table 13.4-201 Item 8 | Fire Protection - New Fuel Areas (per RG 1.189) | [] |
| <u>02.D.(10)(e)3. and 02.D.(11)</u> Table 13.4-201 Item 8 | Fire Protection - All other features | [] |
| <u>02.D.(10)(f) and 02.D.(11)</u> Table 13.4-201 Item 9 | Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls | [] |
| <u>02.D.(10)(g) and 02.D.(11)</u> Table 13.4-201 Item 9 | Offsite Dose Calculation Manual | [] |

Enclosure 2 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4

Combined License (COL) Operational Programs and Other License Conditions Implementation Schedule Redacted Version

| COL Reference FSAR Reference | Program Name | Implementation Date |
|---|---|----------------------------|
| <u>02.D.(10)(h) and 02.D.(11)</u> Table 13.4-201 Item 9 | Radiological Environmental Monitoring | [] |
| <u>02.D.(10)(i) and 02.D.(11)</u> Table 13.4-201 Item 9 | Process Control | [] |
| <u>02.D.(10)(j)1. and 02.D.(11)</u> Table 13.4-201 Item 10 | Radiation Protection Program: Prior to Initial Receipt of Byproduct, Source, or Special Nuclear Materials | [] |
| <u>02.D.(10)(j)2. and 02.D.(11)</u> Table 13.4-201 Item 10 | Radiation Protection Program: Prior to Receipt of Fuel Onsite | [] |
| <u>02.D.(10)(j)3. and 02.D.(11)</u> Table 13.4-201 Item 10 | Radiation Protection Program: Prior to Initial Fuel Load | [] |
| <u>02.D.(10)(j)4. and 02.D.(11)</u> Table 13.4-201 Item 10 | Radiation Protection Program: Prior to Shipment of Radioactive Waste | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 11 | Non-Licensed Plant Staff Training (non- radioactive) | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 11 | Non-Licensed Plant Staff Training (portions applicable to radioactive material) | [] |
| <u>02.D.(10)(k) and 02.D.(11)</u> Table 13.4-201 Item 12 | Reactor Operator Training | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 13 | Reactor Operator Requalification | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 14 | Unit 3 Emergency Planning: Full Participation Exercise | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 14 | Unit 3 Emergency Planning: Onsite Exercise | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 14 | Unit 4 Emergency Planning: Full Participation Exercise | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 14 | Unit 4 Emergency Planning: Onsite Exercise | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 14 | Emergency Planning: Detailed Implementing Procedures for Emergency Plan | [] |
| <u>02.D.(10)(o) and 02.D.(11)</u> Table 13.4-201 Item 15 | Physical Protection Program (for special nuclear material before Protected Area is operational) | [] |

Enclosure 2 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4

Combined License (COL) Operational Programs and Other License Conditions Implementation Schedule Redacted Version

| COL Reference FSAR Reference | Program Name | Implementation Date |
|---|---|----------------------------|
| <u>02.D.(11)</u> Table 13.4-201 Item 15 | Physical Security Program | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 15 | Safeguards Contingency Program | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 15 | Security Training and Qualification Program | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 16 | Quality Assurance | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 17 | Maintenance Rule | [] |
| <u>02.D.(10)(l) and 02.D.(11)</u> Table 13.4-201 Item 18 | MOV Testing | [] |
| <u>02.D.(10)(m)1. and 02.D.(11)</u> Table 13.4-201 Item 19 | Initial Test Program - Component | [] |
| <u>02.D.(10)(m)2. and 02.D.(11)</u> Table 13.4-201 Item 19 | Initial Test Program - Pre-Operational | [] |
| <u>02.D.(10)(m)3. and 02.D.(11)</u> Table 13.4-201 Item 19 | Initial Test Program - Startup | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for Construction Workers and First-Line Supervisors | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for Construction Management and Oversight Personnel | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for Security Personnel (WECTEC) | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for Security Personnel (SNC) | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for FFD personnel | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for TSC and EOF personnel | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 20 | FFD for Operations | [] |
| <u>02.D.(11)</u> Table 13.4-201 Item 21 | Cyber Security | [] |

Enclosure 2 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4

Combined License (COL) Operational Programs and Other License Conditions Implementation Schedule Redacted Version

| COL Reference FSAR Reference | Program Name | Implementation Date |
|---|---|----------------------------|
| <u>02.D.(10)(n) and 02.D.(11)</u> Table 13.4-201 Item 22 | Special Nuclear Material Control and Accounting | [] |
| <u>02.D.(12)(f)1.</u> Section 3.8.4.8 | Construction inspection procedures for steel concrete composite construction activities for seismic Category I nuclear island structural modules for minimum required reinforcement, steel plate thickness, and concrete thickness. | [] |
| <u>02.D.(12)(f)1.</u> Section 3.8.4.8 | Construction inspection procedures for steel concrete composite construction activities for seismic Category I shield building modules for minimum required reinforcement, steel plate thickness, and concrete thickness. | [] |
| <u>02.D.(12)(f)2.</u> N/A | Spent Fuel Rack Metamic Coupon Monitoring Program | [] |
| <u>02.D.(12)(f)3.</u> N/A | Flow Accelerated Corrosion Program (including construction phase) | [] |
| <u>02.D.(12)(f)4.</u> Section 10.2.3.6 | Turbine Maintenance and Inspection Program | [] |
| <u>02.D.(12)(f)5.</u> N/A | Availability of documented instrumentation uncertainties to calculate a power calorimetric uncertainty | [] |
| <u>02.D.(12)(f)6.</u> N/A | Availability of administrative controls to implement maintenance and contingency activities related to the power calorimetric uncertainty instrumentation | [] |
| <u>02.D.(12)(f)7.</u> N/A | Site-specific severe accident management guidelines | [] |
| <u>02.D.(12)(f)8.</u> N/A | The operational and programmatic elements of the mitigative strategies for responding to circumstances associated with the loss of large areas of the plant due to explosions or fire | [] |
| <u>02.D.(12)(f)9.</u> Section 14.2.3 | ITP administrative manual procedures | [] |

Enclosure 2 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Combined License (COL) Operational Programs and Other License Conditions Implementation Schedule Redacted Version

| <u>COL Reference</u> <u>FSAR Reference</u> | Program Name | Implementation Date |
|---|-----------------------------------|----------------------------|
| <u>02.D.(12)(f)9.</u> Section 14.2.3 | Preoperational testing procedures | See Enclosure 4 |
| <u>02.D.(12)(f)9.</u> Section 14.2.3 | Startup testing procedures | [] |

Southern Nuclear Operating Company

ND-18-1047

Enclosure 4

Redacted Preoperational Test Procedure Completion Schedule

(This Enclosure consists of 9 pages, including this cover page)

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|--|------------------------|
| 3-PWS-ITPP-502 Building 315 Potable Water System | [] |
| 3-WRS-ITPP-501 Radioactive Waste Drain System | [] |
| 3-VWS-ITPP-501 Central Chilled Water System | [] |
| 3-VWS-ITPP-502 Central Chilled Water System Precore Hot Functional | [] |
| 3-DDS-ITPP-501 Data Display and Processing System | [] |
| 3-DDS-ITPP-502 Integrated DCIS Performance | [] |
| 3-IDS-ITPP-501 Class 1E DC and UPS System | [] |
| 3-IDS-ITPP-503 Class 1E DC and UPS System Low Voltage | [] |
| 3-DDS-ITPP-520 Remote Shutdown Workstation | [] |
| 3-OCS-ITPP-504 OCS Local Control Stations | [] |
| 3-PGS-ITPP-501 Plant Gas System | [] |
| 3-PLS-ITPP-506 Control Rod Drive Mechanism Motor-Generator | [] |
| 3-PLS-ITPP-507 Control Rod Drive Mechanism Precore Hot Functional | [] |
| 3-PLS-ITPP-520 Digital Rod Position Indication | [] |
| 3-RXS-ITPP-501 Pre- and Post- Precore Hot Functional Inspection of Reactor Vessel Internals | [] |
| 3-RXS-ITPP-502 Reactor Vessel Internals Vibration | [] |
| 3-RXS-ITPP-503 Integrated Head Package (IHP) | [] |
| 3-SWS-ITPP-501 Service Water System | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|--|------------------------|
| 3-SWS-ITPP-502 Service Water System Precore Hot Functional | [] |
| 3-EDS-ITPP-501 Non-Class 1E DC and UPS System | [] |
| 3-PMS-ITPP-502 PMS Time Response | [] |
| 3-PMS-ITPP-503 PMS Qualified Data Processing System | [] |
| 3-PMS-ITPP-504 PMS RT Actuation | [] |
| 3-PMS-ITPP-505 PMS Nuclear Instrumentation System | [] |
| 3-PMS-ITPP-521 PMS Logic | [] |
| 3-PMS-ITPP-522 PMS Squib Valve Controller Performance | [] |
| 3-PMS-ITPP-523 PMS Containment Pressure High-2 | [] |
| 3-PMS-ITPP-524 PMS Cold Actuations | [] |
| 3-PMS-ITPP-525 PMS Hot Actuations | [] |
| 3-PMS-ITPP-526 PMS MCR Isolation and Passive Containment Cooling System Actuation | [] |
| 3-WGS-ITPP-501 Gaseous Radwaste System+D686 | [] |
| 3-SFS-ITPP-502 Spent Fuel Pool Cooling System Flow Path | [] |
| 3-SFS-ITPP-503 Spent Fuel Pool Cooling Loss of Large Area | [] |
| 3-WSS-ITPP-501 Solid Radwaste System | [] |
| 3-ECS-ITPP-501 6.9 kV Switchgear | [] |
| 3-ECS-ITPP-504 Ancillary Diesel Generator | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|---|------------------------|
| 3-SDS-ITPP-501 Sanitary Drainage System | [] |
| 3-CVS-ITPP-501 Chemical and Volume Control System | [] |
| 3-CVS-ITPP-502 Chemical and Volume Control System Precore Hot Functional | [] |
| 3-PSS-ITPP-501 Primary Sampling System | [] |
| 3-PSS-ITPP-502 Primary Sampling System Precore Hot Functional | [] |
| 3-PXS-ITPP-502 PXS ACC Mapping Line Resistance Test | [] |
| 3-PXS-ITPP-503 Passive Core Cooling System Flow Testing with the RV Head Installed | [] |
| 3-PXS-ITPP-504 Passive Core Cooling System Precore Hot Functional Test | [] |
| 3-PXS-ITPP-505 Passive Core Cooling System Automatic Depressurization Precore Hot Functional | [] |
| 3-RNS-ITPP-501 Normal Residual Heat Removal System | [] |
| 3-RNS-ITPP-502 Normal Residual Heat Removal System Precore Hot Functional | [] |
| 3-WLS-ITPP-501 Liquid Radwaste System | [] |
| 3-PXS-ITPP-506 PXS CMT Mapping and Line Resistance Test | [] |
| 3-PXS-ITPP-507 PXS IRWST Resistance Test | [] |
| 3-MHS-ITPP-501 Nuclear Island Mechanical Handling System | [] |
| 3-SGS-ITPP-502 Steam Generator System | [] |
| 3-SGS-ITPP-504 Steam Generator Hydrostatic | [] |
| 3-SMS-ITPP-501 Special Monitoring System | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|--|------------------------|
| 3-SMS-ITPP-502 Special Monitoring System Precore Hot Functional | [] |
| 3-DAS-ITPP-501 Diverse Actuation System | [] |
| 3-TVS-ITPP-501 Closed Circuit Television System | [] |
| 3-CAS-ITPP-501 Compressed and Instrument Air System | [] |
| 3-IIS-ITPP-501 Incore Instrumentation System | [] |
| 3-MSS-ITPP-501 Main Steam System | [] |
| 3-MSS-ITPP-502 Main Steam System Precore Hot Functional | [] |
| 3-DWS-ITPP-501 Demineralized Water Transfer and Storage System | [] |
| 3-CNS-ITPP-501 ILRT Containment System Leak Rate Test Type A | [] |
| 3-CNS-ITPP-502 ILRT Containment System Leak Test Type B | [] |
| 3-CNS-ITPP-503 ILRT Containment System Leak Test Type C | [] |
| 3-RCS-ITPP-502 Reactor Coolant System | [] |
| 3-RCS-ITPP-503 RCS Primary Hydrostatic | [] |
| 3-RCS-ITPP-504 Pressurizer Pressure Level and Spray Precore Hot Functional | [] |
| 3-RCS-ITPP-505 RCS Precore Hot Functional Instrumentation Calibration | [] |
| 3-RCS-ITPP-506 Reactor Coolant Pump and Reactor Coolant Flow Precore Hot Functional | [] |
| 3-CDS-ITPP-501 Condensate System | [] |
| 3-RWS-ITPP-501 Raw Water System | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|--|------------------------|
| 3-VLS-ITPP-501 VLS Preoperational Test | [] |
| 3-VYS-ITPP-501 Hot Water Heating System | [] |
| 3-ZFS-ITPP-501 Offsite Communication Systems | [] |
| 3-VAS-ITPP-502 Radiologically Controlled Area Ventilation System Precore Hot Functional | [] |
| 3-VAS-ITPP-501 Radiologically Controlled Area Ventilation System | [] |
| 3-CPS-ITPP-501 Condensate Polishing System | [] |
| 3-WWS-ITPP-501 Waste Water System | [] |
| 3-LOS-ITPP-501 Main Turbine and Generator Lube Oil System | [] |
| 3-SSS-ITPP-501 Secondary Sampling System | [] |
| 3-SSS-ITPP-502 Secondary Sampling System Precore Hot Functional | [] |
| 3-VXS-ITPP-501 Annex/Auxiliary Building Nonradioactive Ventilation System | [] |
| 3-VES-ITPP-501 Main Control Room Emergency Habitability System | [] |
| 3-CCS-ITPP-501 Component Cooling Water System | [] |
| 3-CCS-ITPP-502 Component Cooling Water System Precore Hot Functional | [] |
| 3-ZOS-ITPP-501 Onsite Standby Power System | [] |
| 3-ZOS-ITPP-503 Onsite Standby Power System Load Sequencing | [] |
| 3-PWS-ITPP-501 Potable Water System | [] |
| 3-ASS-ITPP-501 Auxiliary Steam Supply System | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|---|------------------------|
| 3-TOS-ITPP-501 Main Turbine Control and Diagnostics System | [] |
| 3-CFS-ITPP-501 Turbine Island Chemical Feed System | [] |
| 3-CFS-ITPP-502 Turbine Island Chemical Feed System Precore Hot Functional | [] |
| 3-HDS-ITPP-501 Heater Drain System | [] |
| 3-VTS-ITPP-501 Turbine Building Ventilation System | [] |
| 3-BDS-ITPP-501 Steam Generator Blowdown System | [] |
| 3-BDS-ITPP-502 Steam Generator Blowdown System Precore Hot Functional | [] |
| 3-VCS-ITPP-501 Containment Recirculation Cooling System | [] |
| 3-VCS-ITPP-502 Containment Recirculation Cooling System Precore Hot Functional | [] |
| 3-VHS-ITPP-501 Health Physics and Hot Machine Shop HVAC System | [] |
| 3-GSS-ITPP-501 Gland Steam System | [] |
| 3-RMS-ITPP-501 Radiation Monitoring System | [] |
| 3-RMS-ITPP-502 Portable Personnel Monitors and Radiation Survey Instruments | [] |
| 3-VFS-ITPP-501 Containment Air Filtration System | [] |
| 3-CWS-ITPP-501 Circulating Water System | [] |
| 3-FWS-ITPP-501 Main and Startup Feedwater System | [] |
| 3-FWS-ITPP-502 Main and Startup Feedwater System Hot Functional | [] |
| 3-FHS-ITPP-521 Fuel Handling System | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|---|------------------------|
| 3-FHS-ITPP-522 Fuel Handling Equipment Indexing | [] |
| 3-FHS-ITPP-523 Fuel Assembly Drag | [] |
| 3-CES-ITPP-501 Condenser Tube Cleaning System | [] |
| 3-MTS-ITPP-501 Main Turbine System | [] |
| 3-MTS-ITPP-502 Main Turbine System Precore Hot Functional | [] |
| 3-VBS-ITPP-501 Nuclear Island Nonradioactive Ventilation System | [] |
| 3-VBS-ITPP-502 Nuclear Island Nonradioactive Ventilation System Precore Hot Functional | [] |
| 3-HCS-ITPP-501 Generator Hydrogen and CO2 Systems | [] |
| 3-HSS-ITPP-501 Hydrogen Seal Oil System | [] |
| 3-TCS-ITPP-501 Turbine Building Closed Cooling Water System | [] |
| 3-TCS-ITPP-503 Stator Cooling Water | [] |
| 3-FPS-ITPP-501 Fire Protection System | [] |
| 3-FPS-ITPP-502 Fire Brigade Support Equipment | [] |
| 3-ZAS-ITPP-501 Main Generation System | [] |
| 3-CMS-ITPP-501 Condenser Air Removal System | [] |
| 3-VZS-ITPP-501 Diesel Generator Building Heating and Ventilation System | [] |
| 3-EFS-ITPP-501 Plant Communications System | [] |
| 3-GEN-ITPP-507 Thermal Expansion | [] |

Enclosure 4 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Preoperational Test Procedure Completion Schedule Redacted Version

| Procedure Number/Name | Completion Date |
|--|------------------------|
| 3-GEN-ITPP-508 Thermal Stratification, Cycling and Striping | [] |
| 3-GEN-ITPP-509 Reactor Coolant System Vibration and Dynamic Effects | [] |
| 3-GEN-ITPP-510 Normal Residual Heat Removal System Vibration and Dynamic Effects | [] |
| 3-GEN-ITPP-511 Passive Core Cooling System Dynamic Effects | [] |
| 3-GEN-ITPP-512 Chemical and Volume Control System Dynamic Effects | [] |
| 3-GEN-ITPP-515 Feedwater, Steam Generator and Steam Generator Blowdown Systems Dynamic Effect | [] |
| 3-GEN-ITPP-517 Precore Hot Functional Test Sequence | [] |
| 3-GEN-ITPP-518 Precore Hot Functional Testing Chemistry | [] |
| 3-GEN-ITPP-521 HVAC Final Air Balancing | [] |
| 3-SJS-ITPP-501 Seismic Monitoring System | [] |
| 3-VRS-ITPP-501 Radwaste Building HVAC System | [] |
| 3-DRS-ITPP-501 Storm Drain System | [] |
| 3-ELS-ITPP-501 Plant Lighting System | [] |
| 3-PCS-ITPP-501 Passive Containment Cooling System PCCAWST | [] |
| 3-PCS-ITPP-502 Passive Containment Cooling System PCCWST | [] |

Southern Nuclear Operating Company

ND-18-1047

Enclosure 6

Confidential Commercial Information Notice

(This Enclosure consists of 2 pages, including this cover page)

Enclosure 6 to ND-18-1047
Vogtle Electric Generating Plant – Units 3 and 4
Confidential Commercial Information Notice

CONFIDENTIAL COMMERCIAL INFORMATION NOTICE

Transmitted herewith are confidential commercial information and/or non-confidential commercial information versions of documents furnished to the NRC in connection with SNC's COL Operational Programs and Other License Conditions Implementation Schedule.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of confidential commercial information so submitted to the NRC, the information which is confidential commercial information in the non-public version is contained within brackets, and where the confidential commercial information has been deleted in the public version, only the brackets remain (the information that was contained within the brackets in the public version having been deleted). The justification for claiming the information so designated as confidential commercial information is indicated in Enclosure 1, Affidavit for Withholding, accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).