



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 10, 2019

Mr. John Ellis, President
Sequoyah Fuels Corporation
P.O. Box 610
Gore, OK 74435

SUBJECT: SEQUOYAH FUELS CORPORATION NRC INSPECTION REPORT
040-08027/2018-002

Dear Mr. Ellis:

This letter refers to the routine, announced U.S. Nuclear Regulatory Commission's (NRC) team inspection conducted onsite from November 28-29, 2018, at the Sequoyah Fuels Site in Gore, Oklahoma. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities and facilities, performance of independent radiation measurements, and interviews with personnel.

During the inspection, the inspectors conducted a confirmatory survey of two areas and collected soil samples from each area. The final analytical results from the soil samples will be provided under separate correspondence. The inspection findings were discussed with you and your staff at the conclusion of the onsite inspection November 29, 2018. No violations were identified and no response to this letter is required.

In accordance with Title 10 of the *Code of Federal Regulations* Part 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary, information so that it can be made available to the Public without redaction.

Should you have any questions concerning this matter, please contact Ms. Marti Poston, Health Physicist, at (817) 200-1181 or the undersigned at (817) 200-1151.

Sincerely,

/RA/

Janine F. Katanic, PhD, CHP, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Docket No.: 040-08027
License No.: SUB-1010

Enclosure:
NRC Inspection Report 040-08027/2018-002

cc: w/enclosure:

J. Matthews
A. Engstrom
W. Andrews
J. Harris
S. Hill
J. Lewis
M. Broderick

**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket No.: 040-08027

License No.: SUB-1010

Report No.: 040-08027/2018-002

Enterprise Identifier: I-2018-002-0097

Licensee: Sequoyah Fuels Corporation
Sequoyah Fuels Facility

Location Inspected: Gore, Oklahoma

Inspection Dates: November 28-29, 2018

Lead Inspector: Martha R. Poston, Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Inspectors: Robert J. Evans, PhD, CHP, PE, Senior Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Christopher D. Steely, Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Accompanied by: Janine F. Katanic, PhD, CHP, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Jordan Caldwell, Environmental Program Specialist
Oklahoma Department of Environmental Quality
Land Protection Division
Radiation Management Section

Approved by: Janine F. Katanic, PhD, CHP, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Attachment: Supplemental Inspection Information

Enclosure

EXECUTIVE SUMMARY

Sequoyah Fuels Corporation NRC Inspection Report 040-08027/2018-002

The U.S. Nuclear Regulatory Commission (NRC) performed a routine, announced, team inspection from November 28-29, 2018, at the Sequoyah Facility which included observations of site activities, independent and confirmatory radiation surveys, review of records, and interviews with site personnel. In summary, the inspectors concluded that the licensee was conducting decommissioning activities in accordance with regulatory and license requirements as described below.

Decommissioning for Materials Licensees

The licensee had sufficient staff for the work in progress. The licensee's standard operating procedures and temporary operating procedures were appropriate for the activities in progress, commensurate with the risks involved. Overall, the licensee was conducting site activities in accordance with regulatory requirements, the license, quality plan, Reclamation Plan and in a manner that protected the environment and the safety and health of workers. (Section 1.2)

Closeout Inspection and Survey

The licensee's radiological survey records indicate that the main process building east area and Pond 3 East had been effectively remediated. The licensee's scan survey results were less than the action level in both areas. The licensee collected a sufficient number of soil samples based on the size and classification of each survey unit. The licensee's soil sample results were less than the release level specified in the Reclamation Plan. The inspectors' preliminary confirmatory survey results indicate that the licensee had effectively remediated both locations. The NRC's soil sample analysis results will be presented to the licensee under separate correspondence. (Section 2.2)

Inspection of Transportation Activities

The licensee's program for shipping raffinate sludge and other waste materials offsite met all procedural and regulatory requirements. The work observed by the NRC inspectors was determined to be in accordance with temporary operating procedures and commitments made in the license. Records associated with the shipping containers and the shipping papers were reviewed and found to be in accordance with license and regulatory requirements. (Section 3.2)

Emergency Preparedness

The licensee took appropriate corrective actions to address a previously identified violation associated with its emergency response program. (Section 4.2)

Report Details

Site Status

Materials License SUB-1010, License Condition 51, authorizes the licensee to implement decommissioning activities in accordance with the Reclamation Plan dated November 2007, as amended (ADAMS Accession Nos. ML120481783, ML080220345 and ML081960238). The licensee commenced site decommissioning activities in April 2009. To decommission the site, the license planned to dismantle and remove systems and equipment, demolish structures, treat sludge and sediments, remediate contaminated soils, and treat wastewater. Most of the residual waste material will be placed in an onsite cell for permanent disposal.

Since the previous NRC inspection in March 2018, documented in NRC Inspection Report 040-08027/2018-001 dated April 13, 2018 (ADAMS Accession No. ML18100B261), the licensee started a campaign to ship 11,000 tons of bagged raffinate sludge, material previous removed from the clarifier basins, and pond sediment from the sanitary lagoon, north ditch and emergency basin to the Energy Fuels White Mesa uranium mill in Blanding, Utah (White Mesa) for use as alternate feed material. At the conclusion of the onsite inspection, the licensee had shipped all raffinate and sanitary lagoon sludge off site and was still shipping the emergency basin and north ditch soils. Overall, the licensee has shipped 10,875 tons of material offsite. The licensee subsequently concluded the shipping campaign on December 1, 2018.

1 Decommissioning for Materials Licensees (IP 87104)

1.1 Inspection Scope

Determine if site activities were conducted in accordance with regulatory requirements and the license, and in a manner that will protect the environment and the safety and health of workers and the public.

1.2 Observation and Findings

The licensee's organization structure is presented in Section 2.2 and Figure 2-1 of the license renewal application, referenced in License Condition 9.1. The organizational requirements for reclamation are also provided in Section 1.0 of the Quality Assurance Program referenced in License Condition 51.C. The licensee's staffing level remains at five, with other functions being provided by contractors. Contractors were used for quality assurance oversight, geotechnical support, cell construction, radiation protection support, site maintenance activities, and shipping campaign. The inspectors concluded that the licensee had sufficient staff to ensure compliance with license and regulatory requirements.

The licensee has an oversight program consisting of routine site inspections, audits, and program reviews. This oversight program, including all audits conducted in calendar year 2017, were reviewed during the previous NRC inspection.

NRC observation of licensee activities included site security, posting and labeling, and instrument calibration. The NRC inspectors did not identify any issues or concerns with site security, site posting and labelling, or instrument calibration.

For the shipping campaign, the licensee developed a series of Temporary Operating Procedures (TOPs) to complete the necessary work. These TOPs were reviewed and are discussed in Section 3.2 of this inspection report. In addition to the TOPs, the licensee generated a Hazardous Work Permit that detailed worker protection requirements for various phases of the shipping campaign. The licensee also provided U.S. Department of Transportation (DOT) training specific to the tasks assigned to each individual. The NRC inspectors reviewed the hazardous work permits, the DOT training provided, and roster of individuals trained and compared them against the training rosters for the TOPs. Records confirmed that all individuals completed both types of training. Respiratory protection was not required for the shipping campaign, so medical respiratory qualifications were not verified. Air sampling conducted was either area grab samples or lapel sampling. A representative number of air sampling results were reviewed and were found to be at or only slightly above background levels.

1.3 Conclusion

The licensee had sufficient staff for the work in progress. The licensee's standard operating procedures and TOPs were appropriate for the activities in progress, commensurate with the risks involved. Overall, the license was conducting site activities in accordance with regulatory requirements, the license, quality plan, Reclamation Plan and in a manner that protected the environment and the safety and health of workers.

2 **Closeout Inspection and Survey (IP 83890)**

2.1 Inspection Scope

Determine if the licensee's decommissioning and associated radiological surveys are appropriate to ensure compliance with regulatory and license requirements.

2.2 Observations and Findings

a. Review of Final Status Surveys

License Condition 51 authorizes the licensee to conduct decommissioning in accordance with the instructions provided in the Reclamation Plan dated November 2007, as amended (ADAMS Accession Nos. ML120481783, ML080220345 and ML081960238). In the Reclamation Plan, the licensee uses the term "cleanup levels" to define the radiological criteria established to satisfy the requirements of Title 10 the *Code of Federal Regulations* (10 CFR) 40, Appendix A, Criterion 6. Therefore, the term cleanup level will be used in this report for consistency. Section 3.2.1 of the Reclamation Plan states, in part, that soils outside of the footprint of the disposal cell with contamination greater than the cleanup level will be placed in the disposal cell. Once remediation is complete, the licensee is required to conduct a survey to demonstrate that the cleanup levels have been satisfied. The cleanup levels are provided in Section 3.2.2 of the Reclamation Plan. In addition, Section 3.2.3 requires the licensee to conduct final status surveys based on the radionuclides of concern for that area. Details about final status surveys are provided in Attachment B to the Reclamation Plan.

Prior to the onsite inspection, the license remediated and surveyed the main process building east area and Pond 3 East. In accordance with the Reclamation Plan, the radionuclide of concern for both areas was natural uranium. As specified in the

Reclamation Plan, Section 3.2.2, the cleanup level for natural uranium is 100 picocuries per gram (pCi/g).

The main process building east area is approximately 2,550 square meters (m²) and is classified under NUREG-1575, Revision 1, Multi-Agency Radiation Survey Site Investigation Manual (MARSSIM), as a Class 1 area, requiring the highest level of survey effort, because the contaminant concentrations were known to be above the cleanup level of 100 pCi/g. The licensee's final status survey included measurement of ambient gamma radiation levels and collection of soil samples. The licensee's surveys were conducted in August-September 2018. Several different surveys were conducted to support subsurface excavation activities.

The inspectors reviewed the licensee's scan surveys and soil sampling records for the main process building east area. MARSSIM recommends that Class 1 land areas be surveyed with a scan coverage of 100 percent. As part of each survey, the licensee collected measurements in areas considered to be representative of background. The licensee established an action level of three times background. Any area that exhibited elevated contamination (greater than three times background) was required to be flagged for further investigation or remediation. With a background of 8,500 counts per minute (cpm), the survey results ranged from background to 15,000 cpm. All survey results were less than the action level of three times background (25,500 cpm). The licensee's records indicated that scan surveys were conducted over the entire survey unit (100 percent) coverage.

As noted earlier, the soil cleanup level for natural uranium is 100 pCi/g, regardless of depth of the contamination (in practice, total uranium is measured in lieu of natural uranium). Per the Reclamation Plan, the cleanup level is applied without subtracting background values. If the soil sample results are less than the cleanup level, then the licensee has effectively remediated the area.

The licensee collected 12 soil samples from the main process building east area, including one duplicate and one replicate sample. Several weeks after the area was initially sampled, the licensee conducted additional subsurface excavations in the survey unit. The licensee collected replacement samples for the samples taken in the areas that were disturbed when the excavation work was performed. The original sample results for those areas were voided. The inspectors reviewed the laboratory analysis results and noted that all samples, including replacement samples, were less than 5 pCi/g, below the cleanup level of 100 pCi/g.

The inspectors reviewed the licensee's survey design for the main process building east area to ensure that the licensee collected a sufficient number of soil samples. Using MARSSIM guidance, for areas with natural uranium contamination only, the licensee calculated that each 2,000 m² Class 1 survey unit should have at least eight sample locations—one sample for every 250 m² of surface area. In addition, the licensee is required to collect duplicate/split and replicate samples for quality assurance/quality control requirements. In summary, the licensee collected a sufficient number of samples to comply with Reclamation Plan and procedural requirements and consistent with MARSSIM guidance.

The Pond 3 East area is approximately 15,700 m² and is classified as a MARSSIM Class 3 area, an area having the lowest potential for elevated radioactivity. Similar to

the main processing building east area, the licensee measured the ambient gamma radiation levels and collected soil samples in Pond 3 East. For Class 3 areas, MARSSIM recommends that scan surveys be performed in outdoor areas with the highest potential for contamination based on professional judgment. Per MARSSIM, there is no limit for the survey unit size, thus, the Pond 3 East area was considered to be one survey unit. Using the MARSSIM methodology, the licensee calculated that at least nine soil samples had to be collected from this survey unit. The licensee collected 27 soil samples including three duplicate and three replicate samples from the Pond 3 East survey unit. All sample results were less than 2.6 pCi/g, below the 100 pCi/g cleanup level specified in the Reclamation Plan.

The inspectors reviewed the licensee's gamma radiation scan survey results for the Pond 3 East area. The licensee provided the inspectors with electronic data (data points on a map) indicating that no sample result exceeded twice background. The licensee's scan coverage was roughly 60 percent of the survey unit. The inspectors noted that the licensee implemented the survey of Pond 3 East in accordance with MARSSIM guidance.

b. Confirmatory Surveys

The inspectors conducted confirmatory surveys of the main process building east area and Pond 3 East. The purpose of these confirmatory surveys was to determine the effectiveness and accuracy of the licensee's final status surveys relative to whether the areas met the acceptance criteria established in the Reclamation Plan. The inspectors' confirmatory surveys included measurement of ambient gamma exposure rates and collection of soil samples.

The inspectors conducted the walkover gamma scan surveys using a Ludlum Model 18 count rate meter with 44-10 probe (serial number 15504; calibration due date July 17, 2019); and a Ludlum Model 2221 count rate meter (serial number 161573; calibration due date July 9, 2019). Prior to conducting the gamma scans, the inspectors measured the ambient background level to establish action levels for the two survey meters. The NRC's background measurements were recorded outside of the restricted area in the yard adjacent to the administration building. Because the licensee's action level was three times the background level, for consistency, the inspectors' action levels were also set at three times the measured background level.

The inspectors conducted walkover gamma scan surveys of the main process building east area. With a background of 8,000 cpm for the two survey meters, the ambient gamma radiation levels ranged from 11,000-15,000 cpm for the Model 18 meter and 10,000-15,000 cpm for the Model 2221 meter. Within the Pond 3 East survey unit, the ambient gamma radiation levels ranged from 9,000-11,000 cpm for the Model 18 survey meter and 8,000-15,000 cpm for the Model 2221 survey meter. All scan survey results were less than the action level of three times background (24,000 cpm).

During the confirmatory survey of Pond 3 East, the inspectors noted that portions of the original liner remained in place. In these areas, the inspectors were only able to scan survey the pond surfaces above the liner. At the inspectors' request, the licensee's staff removed the liner in areas that had been previously repaired. The inspectors conducted surveys in these areas to ensure that radioactive material had not leaked below the liner.

None of these areas exhibited elevated gamma radiation levels relative to the rest of the pond.

The inspectors selected four areas from each of the two survey units for soil sampling for comparison to the cleanup level of 100 pCi/g as specified in the Reclamation Plan. The soil samples were collected at locations where gamma scan surveys indicated an elevated radiation level in comparison to surrounding locations, or areas where radioactive material may have accumulated such as drainage pathways. Immediately after the soil samples were collected, the licensee conducted a measurement of the samples using its x-ray fluorescent meter. The licensee's measurements indicated that all the samples contained less than or equal to 6.7 pCi/g of uranium, results that were below the cleanup level of 100 pCi/g.

The inspectors submitted the eight soil samples to the NRC's contract laboratory for analysis. The samples were to be analyzed by gamma spectroscopy for determination of total uranium concentrations. The licensee collected split samples for possible offsite analysis. At the end of the inspection period, the NRC's contract laboratory had not completed its analysis of the eight soil samples. The inspectors will present the final soil sample results to the licensee at a later date under separate correspondence.

2.3 Conclusions

The licensee's radiological survey records indicate that the main process building east area and Pond 3 East had been effectively remediated. The licensee's scan survey results were less than the action level in both areas. The licensee collected a sufficient number of soil samples based on the size and classification of each survey unit. The licensee's soil sample results were less than the release level specified in the Reclamation Plan. The inspectors' preliminary confirmatory survey results indicate that the licensee had effectively remediated both locations. The NRC's soil sample analysis results will be presented to the licensee under separate correspondence.

3 **Inspection of Transportation Activities (IP 86740)**

3.1 Inspection Scope

Determine if the licensee was transporting waste in accordance with license and regulatory requirements.

3.2 Observations and Findings

Since the previous NRC inspection in March 2018, the licensee shipped the majority of the raffinate sludge and soils to the uranium mill in Utah. During this inspection, the licensee continued to ship material offsite. The licensee subsequently completed the shipping campaign on December 1, 2018.

The inspectors observed the licensee's process for receipt, survey, and loading of trucks. Work was performed in accordance with the following TOPs: (1) TOP-18-001, "Shipment of raffinate bags of material to Energy Fuels," dated March 16, 2018; (2) TOP-18-002, "Support shipment of material (access controls)," dated March 23, 2018; (3) TOP-18-003, "Staging of shipment of material for pickup," dated March 30, 2018; (4) TOP-18-004, "Quality Control and reuse of packaging," dated April 11, 2018;

(5) TOP-18-005, "Shipment of sanitary lagoon bags to Energy Fuels," dated May 1, 2018; and (6) TOP-18-006, "Maintenance and repair of packages," dated May 11, 2018.

Per the licensee's procedures, radiation surveys and swipe samples were obtained on trucks upon arrival at the site to ensure that no contamination was present. Once determined to be non-contaminated, the truck had two options for obtaining its next load for transport: (1) the truck could participate in a live load, or (2) it could proceed to a staging area and unhook the empty trailer and hook up to a preloaded trailer. A live load shipment required the truck to enter the access controlled area, and the licensee's staff loaded IP-2 super sacks onto the flatbed. Each IP-2 super sack contained an average of four bags of raffinate sludge. Multiple IP-2 super sacks (4 to 5) were loaded on the truck. Then, the truck moved to the staging area. Under both options, once in the staging area, a radiological survey of the super sacks was performed, the truck was surveyed for dose rates to the driver and at one meter, and the transport index was determined. Once these surveys were performed, the truck driver placed tarps over the IP-2 super sacks and strapped the tarps down, and the shipping papers were generated and provided to the driver for transport to White Mesa. Since the licensee was at the end of the shipping campaign, the NRC inspectors observed only live loads since most of the truck drivers were on their last run to support the campaign and wanted to retain their own trailer.

The NRC inspectors conducted side by side surveys with the licensee of the truck upon arrival and post loading using a Ludlum Model 19 microR meter calibrated to radium-226 (NRC ID# 015518, serial number 33033, calibrated November 9, 2018). Dose rates measured by the licensee (using an RO-2 survey meter) and the NRC were indistinguishable from background levels for truck and trailer arrival, and for the truck occupied areas and at one meter from the loaded IP-2 super sacks. Dose rates near the loaded IP-2 super sacks ranged between 200 to 500 microrem per hour using the Ludlum Model 19 survey meter.

The NRC inspectors reviewed the certificate of compliance (COC) for the IP-2 super sacks used to ship the sludge and soils to White Mesa. The COC indicated the super sacks were rated for 8,000 lbs., and were not suitable for free standing liquids. The IP-2 super sacks were constructed with 2 ply polypropylene with 10 ounce, woven geotextile for puncture resistance. The sacks were manufactured with lifting straps on each side. The licensee asked the vendor to add additional straps to the ends of the super sack. The vendor made that modification and also retested the super sacks for compliance with the DOT requirements for lift strap [49 CFR 172.410(b)]; water spray [40 CFR 173.465(b)]; drop test [49 CFR 173.465(c)]; stack test [40 CFR 173.465(d)]; and penetration test [49 CFR 173.465(e)]. No issues or concerns were identified with the COC or re-testing result for the modified IP-2 super sack.

Once the material arrived at White Mesa, the waste bags were unloaded from the IP-2 super sacks, and the empty IP-2 super sacks were returned to the site. The site had a TOP for visually inspecting the incoming super sacks and for decontaminating, surveying, and reusing the IP-2 super sack. The TOP and records generated under this re-use program were reviewed by the inspectors and no issues were identified.

Shipping papers were prepared by the licensee based on the bags loaded into each IP-2 super sack using a computer program. The licensee performed a radiological analysis for each location (i.e.; raffinate sludge, sanitary lagoon sludge, raffinate soils, north ditch

and emergency basin), creating a composite sample for each location based on multiple soil samples. Then using the composite sample results, the location where the soils came from, and the weight in each bag, the licensee determined the activity of each IP-2 super sack and each shipment. The NRC inspectors reviewed the analytical results for the north ditch and emergency basin areas, the computer program, and the process for preparing shipping papers. In addition, the NRC inspectors reviewed a representative sample of the shipping papers generated by the licensee for the 255 shipments made since March 19, 2018. No issues or items of concern were identified.

3.3 Conclusions

The licensee's program for shipping raffinate sludge and other waste materials offsite met all procedural and regulatory requirements. The work observed by the NRC inspectors was determined to be in accordance with TOPs and commitments made in the license. Records associated with the shipping containers and the shipping papers were reviewed and found to be in accordance with license and regulatory requirements.

4 Emergency Preparedness (IP 88050)

4.1 Inspection Scope

Determine if the licensee took appropriate and lasting corrective actions to address a previous violation related to the licensee's emergency preparedness program.

4.2 Observations and Findings

During the previous NRC inspection in March 2018, the NRC inspectors reviewed the licensee's emergency preparedness program and determined that it was adequate to protect the safety and health of employees, members of the public and the environment, with one exception. The NRC inspectors identified a violation (VIO-040-08027/2018-01-01) associated with License Condition 44, which requires the licensee to have procedures which evaluate the consequences of a spill or incident/event against the requirements of 10 CFR Part 20, Subpart M, and 10 CFR 40.60 reporting criteria.

The licensee responded to the Notice of Violation by letter dated March 20, 2018 (ADAMS Accession No. ML18087A045). The licensee's corrective actions included development of standard operation procedure SOP-A-207, "Reporting Requirements for NRC," dated March 20, 2018, which detailed the NRC reporting requirements for incidents and events. Training on this new procedure was provided to the managers who would be using the procedure to make the required notifications to the NRC. The development and implementation of this procedure closes the violation.

4.3 Conclusions

The licensee took appropriate corrective actions to address a previously identified violation associated with its emergency response program.

5 Exit Meeting Summary

The NRC inspectors presented the inspection findings to the licensee's representatives at the conclusion of the onsite inspection on November 29, 2018. The final inspection findings will be presented to the licensee after receipt of the soil sample results from the NRC's contract laboratory. During the inspection, the licensee did not identify any information reviewed by the inspectors as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

Partial List Of Persons Contacted

Licensee Personnel

J. Ellis, President
S. Munson, Manager, Safety, Health and Environment
R. Miller, Contractor RMA
K. Schlag, Contractor, RMA
C. Harlin, Licensing

Inspection Procedures (IP) Used

IP83890	Closeout Inspection and Survey
IP87104	Decommissioning for Materials Licensees
IP88050	Emergency Preparedness
IP86740	Inspection of Transportation Activities

Items Opened, Closed and Discussed

Opened

None

Closed

VIO 040-08027/1801-01-01 Failure to implement procedure required by license

Discussed

None

List of Acronyms

ADAMS	Agencywide Documents Access and Management System
cpm	counts per minute
COC	certificate of compliance
CFR	<i>Code of Federal Regulations</i>
DOT	U. S. Department of Transportation
IP	NRC Inspection Procedure
m ²	square meters
MARSSIM	Multi-Agency Radiation Survey Site Investigation Manual
NRC	U.S. Nuclear Regulatory Commission
pCi/g	picocuries per gram
TOP	temporary operating procedure
VIO	violation

SEQUOYAH FUELS CORPORATION NRC INSPECTION REPORT 040-08027/2018-002 -
DATED JANUARY 10, 2019

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