



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

April 5, 2019

EA-18-138

Mr. John Dinelli, Site Vice President
Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - NOTICE OF VIOLATION;
NRC INSPECTION REPORT 05000382/2018010 AND INVESTIGATION
REPORT 4-2017-022

Dear Mr. Dinelli:

This letter refers to the investigation completed on September 27, 2018, by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) at Waterford Steam Electric Station, Unit 3. The purpose of the investigation was to determine whether several nonlicensed operators willfully failed to perform operator rounds as required, and whether these nonlicensed operators willfully provided inaccurate information regarding completion of required operator rounds to the licensee.

In a telephonic exit briefing on March 27, 2019, Mr. Neil O'Keefe of my staff informed you that the NRC was considering escalated enforcement for apparent violations involving the deliberate failure of several nonlicensed operators to perform required operator rounds, and the deliberate failure of these nonlicensed operators to ensure that information required by statute or the Commission's regulations to be maintained by Entergy Operations, Inc. (Entergy) shall be complete and accurate in all material respects. Mr. O'Keefe also informed you that we had sufficient information regarding the apparent violations and your corrective actions to make an enforcement decision without the need for a predecisional enforcement conference or a written response. You indicated that you did not believe that a predecisional enforcement conference or written response was needed and that you accept the violations on behalf of Entergy.

Based on the information developed during the investigation, the NRC determined that two violations of NRC requirements occurred. These violations are cited in Enclosure 1, Notice of Violation (Notice), and the circumstances surrounding them are described in the factual summary (Enclosure 2) and in the inspection report (Enclosure 3). In sum, nine nonlicensed operators (NLOs) deliberately failed to tour all required areas of their watch station and deliberately entered inaccurate information into the operator logs. This caused Entergy to be in violation of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, Criterion V and 10 CFR 50.9. Therefore, these violations are categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level III problem.

In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$145,000 is considered for a Severity Level III problem.

Because the Severity Level III problem was associated with willful Severity Level III violations, the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the NRC Enforcement Policy. The NRC determined that *Identification* credit was warranted because the violations were identified when Entergy initiated an internal review of nonlicensed operator rounds at the Waterford Station following the receipt of operating experience and identified logkeeping performance discrepancies.

Your corrective actions included: (1) disciplining the nonlicensed operators who failed to perform rounds; (2) revising procedures to require nonlicensed operators to record logs while in front of equipment; (3) requiring nonlicensed operators to make a log entry at the completion of leach shift, attesting that the rounds were completed and data is correct; (4) performing quarterly audits of operator rounds for each crew; (5) requiring supervisors to perform field observations of nonlicensed operators three times per month; and (6) performing a root cause evaluation and implementing broad corrective actions to address the low standards and lack of field presence. Additional corrective actions are documented in Enclosure 3. As a result, the NRC determined that *Corrective Action* credit was warranted.

Therefore, to encourage prompt identification and comprehensive correction of violations, I have been authorized, after consultation with the Director, Office of Enforcement not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.


In Section V of the Confirmatory Order, EA-17-132/153, issued to Entergy on March 12, 2018, Agencywide Documents Access and Management System (ADAMS) Accession ML18072A191, the NRC indicated it would consider enforcement discretion for violations that meet the criteria for discretion under Section 3.3 of the NRC Enforcement Policy. Although the violation was identified by Entergy, the NRC is not exercising discretion in this instance because it was not identified as part of the corrective action for the previous enforcement action.

The NRC has concluded that information regarding: (1) the reason for the violations; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the Waterford Steam Electric Station, Unit 3 docket in Enclosure 3. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice (Enclosure 1).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your responses, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room and in ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this matter, please contact Mr. Neil O'Keefe of my staff at 817-200-1574.

Sincerely,



Scott A. Morris
Regional Administrator

Docket No. 50-382
License No. NPF-38

Enclosures:

1. Notice of Violation
2. Factual Summary
3. NRC Inspection Report 05000382/2018010

NOTICE OF VIOLATION

Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3

Docket No. 50-382
License No. NPF-38
EA-18-138

During an NRC investigation completed on September 27, 2018, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with documented instructions or procedures of a type appropriate to the circumstances.

Entergy Procedure EN-OP-115-01, "Operator Rounds," Revision 1, a quality-related procedure intended to meet this requirement for nonlicensed operators performing watchstanding rounds, Step 5.1.7, requires, in part, that watchstanders tour all required areas of their watchstation.

Contrary to the above, from December 2013 to January 2017, watchstanders failed to tour all required areas of their watchstation. Specifically, nine nonlicensed operators deliberately failed to tour all assigned areas of the plant during their assigned watchstanding rounds.

- B. 10 CFR 50.9 requires, in part, that information required by statute or the Commission's regulations to be maintained by the licensee shall be complete and accurate in all material respects.

10 CFR Part 50, Appendix B, Criterion XVII requires, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses.

Contrary to the above, from December 2013 to January 2017, the licensee failed to maintain information required by the Commission's regulations that was complete and accurate in all material respects. Specifically, nine nonlicensed operators deliberately submitted operating logs for assigned plant areas which they had not toured and which were not complete and accurate in all material respects. The operating logs are required by 10 CFR Part 50, Appendix B, Criterion XVII to be maintained by the licensee. The information was material to the NRC because the NRC uses the information in the performance of inspections to ensure that the condition of safety-related equipment is being monitored as required by licensee procedures.

This is a Severity Level III problem (NRC Enforcement Policy, Section 2.2.1.d).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was achieved, is already adequately addressed in Enclosure 3.

However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or

your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation; EA-18-138," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511 and a copy to the NRC Resident Inspector at the Waterford Steam Electric Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 5th day of April 2019

FACTUAL SUMMARY
OFFICE OF INVESTIGATIONS REPORT 4-2017-022

On March 15, 2017, the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations initiated an investigation to determine whether nonlicensed operators (NLOs) willfully failed to perform operator rounds as required, and whether the NLOs willfully provided inaccurate information regarding completion of required operator rounds at Waterford Steam Electric Station, Unit 3. The NRC completed its investigation on September 27, 2018.

Security and badge access records showed that nine NLOs failed to enter one or more plant areas required as part of their rounds, even though the NLOs in question entered completed round logs into the electronic recordkeeping system. During the investigation interviews, eight NLOs admitted that they completed the electronic logs without entering the assigned areas, and seven admitted doing so intentionally. Documentation of operator rounds are material to the NRC because the NRC uses the information in the performance of inspections to ensure the condition of safety-related equipment is being monitored as required by station procedures.

NLO-1:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area missed included one log point as part of the operator round. During the OI interview, NLO-1 described the day in question as "the worst day" of the NLO'S employment, which included losing keys, becoming contaminated, and a fire drill. NLO-1 confessed to intentionally missing the log point because of a time issue related to the events of the day.

NLO-2:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area missed included multiple log points as part of the operator round. During the first OI interview, NLO-2 described that another NLO on watch had inspected the log points in the area in question and provided the information to NLO-2. However, in the second OI interview, when presented with evidence that the scenario described in the first interview could not have happened, NLO-2 admitted that he/she experienced a lapse of judgment that caused the missed log points.

NLO-3:

Documentary evidence indicates that operator rounds in multiple areas were missed. Specifically, documentary evidence showed that operator rounds were inaccurate on eight different occasions. One of the areas in question contained one log point; the second area contained multiple log points. During the OI interview, NLO-3 offered no specific or verifiable legitimate explanation for the discrepancies and admitted to intentionally failing to perform the rounds.

NLO-4:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area missed included one log point as part of the operator round. During the OI interview, NLO-4 confessed to missing the log point in question, and stated that he/she knew it was wrong.

NLO-5:

Documentary evidence indicates that operator rounds in three areas were missed during the period evaluated. Two of the areas were missed twice, and one area was missed once. All three areas missed included multiple log points as part of the operator round. NLO-5 initially stated that the discrepancies were not intentional. However, NLO-5 confessed that in the past, he/she had intentionally failed to perform and document rounds accurately. Further investigation confirmed that NLO-5 had missed log points in the past.

NLO-6:

Documentary evidence indicates that operator rounds in one area were missed two times during the period evaluated. The area missed contained multiple log points as part of the operator round. During the OI interview, NLO-6 admitted to intentionally missing the log points.

NLO-7:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area missed included one log point as part of the operator round. During the OI interview, NLO-7 admitted to intentionally missing the log points.

NLO-8:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area in question requires the operator to perform multiple log points as part of the operator round. During the OI interview, NLO-8 did not dispute that the discrepancy existed but stated that the missed log points were unintentional.

NLO-9:

Documentary evidence indicates that operator rounds in one area were missed one time during the period evaluated. The area in question requires the operator to perform one log point as part of the operator round. During the OI interview, NLO-9 admitted intentionally missing the log point.

Based on the evidence, the nine NLOs deliberately failed to tour all required areas of their watch station and deliberately entered inaccurate information into the operator logs. This caused the licensee to be in violation of 10 CFR Part 50, Appendix B, Criterion V and 10 CFR 50.9.

**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000382

License Numbers: NPF-38

Report Numbers: 05000382/2018010

Enterprise Identifier: I-2018-010-0074

Licensee: Entergy Operations, Inc.

Facility: Waterford Steam Electric Station, Unit 3

Location: Killona, Louisiana

Inspection Dates: December 3, 2018, to March 27, 2019

Inspectors: R. Bywater, Resident Inspector, Palo Verde
J. Dixon, Senior Project Engineer

Approved By: Neil O'Keefe
Chief, Project Branch D
Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an inspection at Waterford Steam Electric Station, Unit 3 in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information. NRC-identified and self-revealed findings, violations, and additional items are summarized in the table below.

List of Findings and Violations

Failure to Perform Operator Rounds			
Cornerstone	Significance	Cross-cutting Aspect	Inspection Procedure
Not Applicable	Severity Level III NOV 05000382/2018010-01 Open EA-18-138	Not Applicable	Not Applicable
Based on the information developed in Investigation 4-2017-022, the NRC concluded that nine nonlicensed operators deliberately failed to tour all required areas of their watchstation in accordance with Procedure EN-OP-115-01, "Operator Rounds." This violation is one of two violations that are categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level III problem.			

Falsification of Operator Rounds Records			
Cornerstone	Significance	Cross-cutting Aspect	Inspection Procedure
Not Applicable	Severity Level III NOV 05000382/2018010-02 Open EA-18-138	Not Applicable	Not Applicable
Based on the information developed in Investigation 4-2017-022, the NRC concluded that nine nonlicensed operators deliberately entered inaccurate information into the operator logs in violation of 10 CFR 50.9. This violation is one of two violations that are categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level III problem.			

MISCELLANEOUS – TRADITIONAL ENFORCEMENT

On January 31, 2017, Waterford 3 management informed the NRC's resident inspectors of anomalies identified during their review of nonlicensed operator (NLO) rounds and logs. Specifically, in December 2016, following receipt of operating experience from another plant, Entergy initiated an internal review of NLO rounds and log keeping performance. Based on the licensee's initial reporting of discrepancies, the NRC Office of Investigations (OI) performed an investigation of the discrepancies. The inspectors independently reviewed the licensee's and OI's investigations. The inspectors also reviewed the licensee's causal evaluation and the actions taken to address the Confirmatory Order associated with EA-17-132 and EA-17-153, Agencywide Documents Access and Management System (ADAMS) Accession ML18072A191. The inspectors documented the review of the corrective actions in NRC Inspection Report 05000416/2019012, 05000313/2019014 and 05000368/2019014, 05000458/2019013, and 05000382/2019012 (ADAMS Accession ML19094B867).

INSPECTION RESULTS

Failure to Perform Operator Rounds			
Cornerstone	Significance/Severity	Cross-cutting Aspect	Inspection Procedure
Not Applicable	Severity Level III NOV 05000382/2018010-01 Open EA-18-138	Not Applicable	Not Applicable
<p>Based on the information developed in Investigation 4-2017-022, the NRC concluded that nine nonlicensed operators deliberately failed to tour all required areas of their watchstation in accordance with Procedure EN-OP-115-01, "Operator Rounds." This violation is one of two violations that are categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level III problem.</p>			
<p><u>Description:</u> In December 2016, following receipt of operating experience from another plant, Entergy initiated an internal review to look for NLO rounds and log keeping performance discrepancies. The licensee's review identified multiple log taking discrepancies and reported them to the NRC on January 31, 2017. Following receipt of this information, the NRC Office of Investigations initiated an investigation.</p> <p>Entergy Procedure EN-OP-115-01, "Operator Rounds," Revision 1, a quality-related procedure for NLOs performing watchstanding rounds, Step 5.1.7, requires, in part, that watchstanders tour all required areas of their watchstation. The NRC determined that from December 2013 to January 2017, nine NLOs failed to tour all required areas of their watchstation.</p> <p>The inspectors determined that the licensee's corrective actions were prompt and reasonably comprehensive. Actions taken included:</p> <ul style="list-style-type: none"> The licensee terminated the NLOs it concluded had engaged in deliberate misconduct. The NLOs it concluded had engaged in careless disregard were disciplined with one day of unpaid leave. 			

- Procedures were revised to require NLOs to record logs while in front of equipment.
- A requirement was added such that NLOs are required to make a log entry at the completion of rounds attesting that they personally completed the entire set of rounds and entered correct data. They must also discuss the results/challenges encountered during rounds with their supervisor.
- Quarterly audits of operator rounds were instituted for each operating crew. The results must be communicated to the workers to reinforce the standards and emphasize the importance of conducting and documenting proper rounds.
- Supervisors for NLOs are now required to perform field observations of NLOs three times per month, including observation of rounds and log taking.

Enforcement:

Significance: The ROP's significance determination process does not specifically consider willfulness in its assessment of licensee performance. Therefore, it is necessary to address this violation which involves willfulness using the traditional enforcement process.

Notice of Violation:

Title 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with documented instructions or procedures of a type appropriate to the circumstances.

Entergy Procedure EN-OP-115-01, "Operator Rounds," Revision 1, a quality-related procedure intended to meet this requirement for NLOs performing watchstanding rounds, Step 5.1.7, requires, in part, that watchstanders tour all required areas of their watchstation.

Contrary to the above, from December 2013 to January 2017, watchstanders failed to tour all required areas of their watchstation. Specifically, nine NLOs failed to tour all assigned areas of the plant during watchstanding rounds.

The staff determined that the licensee should receive credit for identification of the problem. The licensee took voluntary action to respond to industry operating experience at a site in another fleet (a self-monitoring effort), specifically looking for examples of improper rounds by NLOs and inconsistent logs.

The staff determined that the licensee should receive credit for corrective actions for the violations. The staff determined that licensee took substantive corrective action intended to detect, correct, and deter future misconduct and implemented those actions at each site in the Entergy fleet. Many of the corrective actions were taken in response to a Confirmatory Order dated March 12, 2018 (ADAMS Accession ML18072A191). The implementation of these corrective actions was reviewed and documented in NRC Inspection Report 05000416/2019012, 05000313/2019014 and 05000368/2019014, 05000458/2019013, and 05000382/2019012 (ADAMS) Accession ML19094B867).

Falsification of Operator Rounds Records			
Cornerstone	Significance/Severity	Cross-cutting Aspect	Inspection Procedure
Not Applicable	Severity Level III NOV 05000382/2018010-02 Open EA-18-138	Not Applicable	Not Applicable

Based on the information developed in Investigation 4-2017-022, the NRC concluded that nine nonlicensed operators deliberately entered inaccurate information into the operator logs in violation of 10 CFR 50.9. This violation is one of two violations that are categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level III problem.

Description: In December 2016, following receipt of operating experience from another plant, Entergy initiated an internal review to look for NLO rounds and log keeping performance discrepancies. The licensee's review identified multiple log taking discrepancies and reported them to the NRC on January 31, 2017. Following receipt of this information, the NRC Office of Investigations initiated an investigation.

The NRC requires records of NLO rounds to be complete and accurate because the NRC uses the information in the performance of inspections to ensure that the condition of safety-related equipment is being monitored as required by licensee procedures. The NRC's investigation determined that from December 2013 to January 2017, the licensee failed to maintain these required records such that they were complete and accurate in all material respects. Specifically, nine NLOs submitted operating logs for assigned plant areas which they had not toured and which were not complete and accurate in all material respects.

The inspectors determined that the licensee's corrective actions were prompt and reasonably comprehensive. Actions taken included:

- The licensee terminated the NLOs it concluded had engaged in deliberate misconduct. The NLOs it concluded had engaged in careless disregard were disciplined with one day of unpaid leave.
- Procedures were revised to require NLOs to record logs while in front of equipment.
- A requirement was added such that NLOs are required to make a log entry at the completion of rounds attesting that they personally completed the entire set of rounds and entered correct data. They must also discuss the results/challenges encountered during rounds with their supervisor.
- Quarterly audits of operator rounds were instituted for each operating crew. The results must be communicated to the workers to reinforce the standards and emphasize the importance of conducting and documenting proper rounds.
- Supervisors for NLOs are now required to perform field observations of NLOs three times per month, including observation of rounds and log taking.

Enforcement:

Significance: The ROP's significance determination process does not specifically consider willfulness in its assessment of licensee performance. Therefore, it is necessary to address this violation which involves willfulness using traditional enforcement to adequately deter non-compliance.

Notice of Violation:

Title 10 CFR 50.9 requires, in part, that information required by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

Title 10 CFR Part 50, Appendix B, Criterion XVII requires, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses.

Contrary to the above, from December 2013 to January 2017, the licensee failed to maintain information required by the Commission's regulations that was complete and accurate in all material respects. Specifically, nine NLOs submitted operating logs for assigned plant areas which they had not toured and which were not complete and accurate in all material respects. The operating logs are required by 10 CFR Part 50, Appendix B, Criterion XVII to be maintained by the licensee. The information was material to the NRC because the NRC uses the information in the performance of inspections to ensure that the condition of safety-related equipment is being monitored as required by licensee procedures.

The staff determined that the licensee should receive credit for identification of the problem. The licensee took voluntary action to respond to industry operating experience at a site in another fleet (a self-monitoring effort), specifically looking for examples of improper rounds by NLOs and inconsistent logs.

The staff determined that the licensee should receive credit for corrective actions for the violations. The staff determined that licensee took substantive corrective action intended to detect, correct, and deter future misconduct and implemented those actions at each site in the Entergy fleet. Many of the corrective actions were taken in response to a Confirmatory Order dated March 12, 2018 (ADAMS Accession ML18072A191). The implementation of these corrective actions was reviewed and documented in NRC Inspection Report 05000416/2019012, 05000313/2019014 and 05000368/2019014, 05000458/2019013, and 05000382/2019012 (ADAMS) Accession ML19094B867).

EXIT MEETINGS AND DEBRIEFS

On March 27, 2019, the NRC staff presented the inspection results to Mr. J. Dinelli, Site Vice President, and other members of the licensee staff in a telephonic exit meeting. The NRC staff verified no proprietary information was retained or documented in this report.

WATERFORD STEAM ELECTRIC STATION, UNIT 3 - NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000382/2018010 AND INVESTIGATION REPORT 4-2017-022-- DATED April 5, 2019

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ADAMS ACCESSION NUMBER: ML19095B573

SUNSI Review: ADAMS: Non-Publicly Available Non-Sensitive Keyword: NRC-002
 By: JGK Yes No Publicly Available Sensitive

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