



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

November 19, 2019

EA-19-042

Mr. James Barstow
Vice President
Nuclear Regulatory Affairs and
Support Services
Tennessee Valley Authority
1101 Market Street, LP 4A-C
Chattanooga, TN 37402-2801

**SUBJECT: WATTS BAR NUCLEAR PLANT – NOTICE OF VIOLATION AND PROPOSED
IMPOSITION OF CIVIL PENALTY – \$145,000, NRC INSPECTION REPORT
NOS. 05000390/2019091 AND 05000391/2019091**

Dear Mr. Barstow:

This refers to an inspection completed on August 1, 2019, by the U. S. Nuclear Regulatory Commission (NRC), concerning activities at the Tennessee Valley Authority's (TVA) Watts Bar Nuclear Plant. The purpose of the inspection was to follow up on Unresolved Item (URI) 05000390, 391/2016011-05 "Common Service Station Transformers A and B General Design Criteria 17 Analyses," which was identified during a prior NRC inspection of August 2016 (NRC Inspection Report (IR) 05000390, 391/2016011, ADAMS Accession Number ML16285A217). The enclosed report presents the results of these inspections. A final exit briefing was conducted (telephonically) with you on August 1, 2019. The details of the inspection are documented in NRC Inspection Report 05000390/2019013 AND 05000391/2019013, issued on August 19, 2019 (ADAMS Accession Number ML19231A179).

The report identified one apparent violation (AV) that was considered for escalated enforcement. The AV involves the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.9(a), which requires, in part, that "Information provided to the Commission by an applicant for a license or by a licensee . . . shall be complete and accurate in all material respects." The NRC inspection identified that TVA, on multiple occasions as part of the licensing of Watts Bar (WBN) Unit 2 from 2010 through 2013, and subsequently as part of a license amendment for WBN Unit 1 in 2015, submitted incomplete and inaccurate information regarding the adequacy of the offsite electric power system, and that information was material for an NRC licensing decision.

In the letter transmitting the inspection report, we provided you the opportunity to address the apparent violation identified in the report by either attending a predecisional enforcement conference or by providing a written response before we made our final enforcement decision. In a letter dated September 12, 2019 (ADAMS Accession Number ML19259A064), you provided a written response to the apparent violation. In your response, you did not dispute that the violation occurred, provided the results of your causal analysis of the issue, and delineated corrective actions taken to preclude recurrence.

Based on the information developed during the inspection, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) and the circumstances surrounding it are described in detail in Inspection Report 05000390/2019013 and 05000391/2019013.

To summarize, on multiple occasions from July 31, 2010, until January 29, 2015, TVA failed to provide information that was complete and accurate in all material aspects. As part of the initial licensing of WBN Unit 2 and subsequently as part of a license amendment for WBN Unit 1, TVA submitted incomplete and inaccurate information regarding the adequacy of the offsite electric power system.

The TVA letters were incomplete and inaccurate because they stated that appropriate analysis had been performed and demonstrated that the station's electric power system was fully capable of meeting its design and licensing bases. The fast bus transfer, an original design feature of both units (as described in non-cited violation 05000390, 391/2019013-01) had not been modeled in the analysis. Had this transfer been modeled in the analysis, the licensee would have recognized that the common service station transfers (CSSTs) 'A' and 'B' could not be used as qualified sources of offsite power when the station configuration aligned Class 1E shutdown boards to the unit service station transformer (USST) via the station's unit boards. This failure to develop a model reflective of the station's specific configuration led the licensee to provide incomplete and inaccurate information to the NRC that was material to the licensing actions for Units 1 and 2.

Based on the NRC's review, the violation did not result in any actual consequences. In this case, TVA did not use CSSTs A and B as qualified sources of offsite power when the station configuration aligned Class 1E shutdown boards to the USST via the station's unit boards. Additionally, TVA did not use the incomplete and inaccurate information in other analyses or design changes to the station's electric power system.

However, the potential consequences of the submittal of incomplete and inaccurate information is significant, in part, because it impeded the NRC's review. The NRC relied on TVA's incomplete and inaccurate information during an NRC inspection documented on October 6, 2016 (IR 05000390/2016011, 05000391/2016011), and was used as part of the basis to approve WBN Unit 1 License Amendment No. 103, dated September 29, 2015. Additionally, the information was used as part of the basis to grant an operating license to WBN Unit 2, as documented in "Safety Evaluation Report Related to the Operation of Watts Bar Nuclear Plant, Units 1 and 2" (NUREG-0847) Supplement 22, dated February 2011, and in the closure of Open Item 27 in NUREG-0847 Supplement 24, dated September 2011. Had TVA provided complete and accurate information during the NRC inspection, and as part of approval of license amendments, the NRC would have conducted significant additional inspection and/or inquiry, or reached different regulatory conclusions. In light of the above, the violation has been categorized at Severity Level III in accordance with the NRC Enforcement Policy.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$145,000 is considered for a SL III violation. Because TVA has been subject to previous escalated enforcement within the past two years¹ of the occurrence of this issue, the NRC considered

¹ The NRC issued a Severity Level III violation on April 7, 2015 (EA-14-179). Additional escalated enforcement was issued April 15, 2019 (EA-18-182), and July 27, 2017 (EA-17-022).

whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy.

The issue was identified by the NRC during the original inspection conducted in August 2016. As such, credit is not warranted for the factor of Identification.

TVA's written response of September 12, 2019, identified a number of corrective actions including, but not limited to: (1) immediate action to place caution cards on the 6.9 Kilovolt (kV) hand switches so that the CSSTs could not be aligned improperly; (2) Operations procedures were updated to prevent crediting CSST A and B as offsite sources for technical specification compliance when the associated 6.9 kV unit board is originally powered from the USST; (3) the relevant calculation was revised to demonstrate that CSST A and/or B are able to supply power for both units only with specified limit as the General Design Criteria 17 compliant immediate offsite power source for either CSST C or D; (4) TVA's procedure for corresponding with the NRC was revised, including multiple changes to the validation process for NRC submittals. Based on the above, credit is warranted for the factor of *Corrective Action*.

Therefore, to emphasize the importance of prompt identification of violations, and the importance of providing complete and accurate information to the NRC, I have been authorized, after consultation with the Director, Office of Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the base amount of \$145,000 for the SL III Violation.

If you disagree with this enforcement sanction, you may deny the violation as described in the Notice, or you may request alternative dispute resolution (ADR) with the NRC in an attempt to resolve this issue. ADR is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained neutral (the "mediator") works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues. Additional information concerning the NRC's ADR program can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

The Institute on Conflict Resolution (ICR) at Cornell University has agreed to facilitate the NRC's program as a neutral third party. If you are interested in pursuing this issue through the ADR program, please contact: (1) the ICR at (877) 733-9415; and (2) James Baptist at (404) 997-4506 within 10 days of the date of this letter. You may also contact both ICR and Mr. Baptist for additional information. Your submitted signed agreement to mediate using the NRC ADR program will stay the 30-day time period for payment of the civil penalties and the required written response, as identified in the enclosed notice, until the ADR process is completed.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance was achieved was adequately addressed in TVA's letter of September 12, 2019. 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.

For administrative purposes, this letter is issued as NRC IR 05000390/2019091 and 05000391/2019091. AVs 05000390/2019013-02 and 05000391/20109013-02 has been re-designated as Violation 05000390/2019091-01 and 05000391/2019091-01.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. The NRC also includes significant enforcement actions on its Web site at http://www.nrc.gov/reading_rm/doc_collections/enforcement/actions/.

If you have any questions concerning this matter, please contact James Baptist of my staff at (404) 997-4506.

Sincerely,

/RA Joel T. Munday for/

Laura A. Dudes
Regional Administrator

Docket Nos.: 50-390 and 50-391
License Nos.: NPF-90 and NPF-96

Enclosures:

1. Notice of Violation and Proposed Imposition of Civil Penalty
2. NUREG/BR-0254 Payment Methods

cc: Distribution via ListServ

SUBJECT: WATTS BAR NUCLEAR PLANT – NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY – \$145,000, NRC INSPECTION REPORT NOS. 05000390/2019091 AND 05000391/2019091

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| DATE | 10/24/2019 | 10/24/2019 | 10/25/2019 | 10/24/2019 | 10/29/2019 | 10/30/2019 |
| OFFICE | OE | NRR | OGC | RII/ORA | | |
| NAME | G Wilson | R. Felts | A Bell | L Dudes /RA J Munday for/ | | |
| DATE | 11/14/2019 | 11/07/2019 | 11/12/2019 | 11/19/2019 | | |

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NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Tennessee Valley Authority
Watts Bar Nuclear Plant
Units 1 and 2

Docket Nos. 50-390/391
License Nos.: NPF-90/96
EA-19-042

During an NRC inspection completed on August 1, 2019, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violation and associated civil penalty is set forth below:

Title 10 CFR 50.9(a), requires, in part, that "Information provided to the Commission by an applicant for a license or by a licensee...shall be complete and accurate in all material respects."

By letter dated July 31, 2010, TVA responded to an NRC request for additional information (RAI), dated July 12, 2010, regarding an analysis of a dual unit trip as a result of abnormal operational occurrence. TVA's response stated, in part, that "This analysis is enveloped by the analysis performed while postulating an accident in one unit and concurrent orderly shutdown of the second unit."

By letter dated July 31, 2010, TVA responded to an NRC RAI, dated July 12, 2010, regarding an analysis of an accident in one unit and concurrent shutdown of the second unit (with and without offsite power). TVA's response stated, in part, "The auxiliary power system was determined to be adequate to support the above scenarios for two unit operation. The voltage recovery times were within the time limits so that 6.9kV shutdown board degraded voltage relays reset and do not separate the 6.9kV shutdown board from the offsite power source."

By letter dated December 6, 2010, TVA responded to an NRC RAI dated July 12, 2010. The letter from TVA stated, in part, "The loading for a dual unit trip is slightly less than the loading with one unit in accident and a spurious accident signal in the other unit. Therefore, a separate load flow was not performed." By letter dated April 6, 2011, TVA stated that they had subsequently performed a separate load flow analysis and, in part, that "A separate load flow was performed for a dual unit shutdown resulting from an abnormal operational occurrence with and without offsite power...This additional analysis will be included in the next revision of AC Auxiliary Power System Analysis Calculation EDQ00099920070002."

By letter dated December 6, 2010, TVA responded to an NRC RAI, dated July 12, 2010, regarding an analysis of an accident in one unit and spurious Engineered Safety Features (ESF) actuation in the other unit. TVA's response stated, in part, "Analysis with one unit in accident and the spurious ESF actuation in the other unit with offsite power has been performed. TVA reviewed the results for the following two bounding configurations: (1) . . . and (2) two shutdown boards on either the A or B CSSTs. This

review determined that the CSSTs have adequate capacity to support all ESF loads for one unit in accident and spurious ESF actuation in the other unit.”

By letter dated April 6, 2011, TVA responded to an NRC action item in Appendix HH of NUREG-0847, Supplement 22, dated February 2011, stating, in part, “a separate load flow was performed for a dual unit shutdown resulting from an abnormal operational occurrence with and without offsite power.”

By letter dated August 1, 2013, TVA submitted a LAR to the WBN, Unit 1 TS bases for section 3.8.1, AC Sources – Operating, LCO. The LAR stated, in part, “A second note has been added to allow common station service transformer (CSST) A or B to be used to meet one of the two qualified offsite circuit requirements of LCO 3.8.1.a. CSSTs A and B directly power the unit boards, and through feeder breakers between the unit board and the shutdown boards, can provide power to the shutdown boards required by LCO 3.8.9, ‘AC Distribution.’ The note allows one of the two CSSTs (A or B) to replace the normal qualified offsite circuit supply (CSST C or D), provided the CSST is only providing power to its normal unit and reactor coolant pump (RCP) boards, and either a) CSST A or B (as applicable) is providing power to the associated shutdown board; or b) the associated shutdown board is being powered by the unit station transformer (USST) and automatic transfer capability from the USST to CSST A or B (as applicable) is OPERABLE. This allowance is acceptable since CSST A and B are capable of providing the proper voltage and frequency to the class 1E shutdown boards.”

By letter dated January 29, 2015, TVA responded to NRC RAIs dated February 26, 2014, and June 2, 2014. The letter stated, in part, “TVA has concluded that based on the upgrades to CSSTs A and B and the supporting electrical studies and engineering calculations, as discussed above and in the references, the requirements of GDC 17 are satisfied and that CSST A or B may be used as proposed in the LAR.”

Contrary to the above, on multiple occasions, from July 31, 2010, until January 29, 2015, the licensee failed to provide information that was complete and accurate in all material aspects. As part of the initial licensing of WBN Unit 2 and subsequently as part of a license amendment for WBN Unit 1, TVA submitted incomplete and inaccurate information regarding the adequacy of the offsite electric power system. Specifically,

- TVA’s analysis of a dual unit trip did not envelop a postulated accident in one unit and concurrent orderly shutdown of the second unit, as was stated in its letter dated July 31, 2010;
- TVA’s auxiliary power system was, in fact, not determined to be adequate to support scenarios for two-unit operation, as was stated in TVA’s letter dated July 31, 2010;
- A separate load flow was not performed for a dual unit shutdown resulting from an abnormal operational occurrence with and without offsite power, as was stated in TVA’s letter dated April 6, 2011;
- The CSSTs, in fact, do not have adequate capacity to support all ESF loads for one unit in accident and spurious ESF actuation in the other unit, as was stated in TVA’s letter dated December 6, 2010;
- CSSTs A and B are, in fact, not capable of providing the proper voltage and frequency to the class 1E shutdown boards, as was stated in TVA’s letter dated August 1, 2013;
- The requirements of GDC 17 are, in fact, not satisfied, as was stated in TVA’s letter dated January 29, 2015.

This information was material to the NRC because it is subject to and was used during an NRC inspection issued on October 6, 2016 (IR 05000390/2016011, 05000391/2016011), and was used as part of the basis to approve WBN Unit 1 License Amendment No. 103, dated September 29, 2015. Additionally, the information was used as part of the basis to grant an operating license to WBN Unit 2, as documented in "Safety Evaluation Report Related to the Operation of Watts Bar Nuclear Plant, Units 1 and 2" (NUREG-0847) Supplement 22, dated February 2011, and in the closure of Open Item 27 in NUREG-0847 Supplement 24, dated September 2011.

This is a Severity Level III Violation (Enforcement Policy 6.9). Based on the submission of incomplete and inaccurate information which occurred on January 29, 2015, solely, the NRC proposes the imposition of a civil penalty of \$145,000.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved was adequately addressed in TVA's letter to the NRC dated September 12, 2019. However, if the description therein does not accurately reflect your position or your corrective actions, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation. In that case, or if you choose to respond, clearly mark your response as a Reply to a Notice of Violation (EA-19-042), and send it to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S., Nuclear Regulatory Commission, Region II, the NRC Resident Inspector at the facility that is the subject of this Notice, and the Document Control Desk, Washington, DC 20555-0001.

TVA may pay the civil penalty proposed above in accordance with NUREG/BR-0254 and by submitting to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, a statement indicating when and by what method payment was made, or may protest imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should TVA fail to answer within 30 days of the date of this Notice, the NRC will issue an order imposing the civil penalty. Should TVA elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violation listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the response should address the factors discussed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or explanation provided pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of TVA is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the

Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., Reply to Notice of Violation, Statement as to Payment of Civil Penalty, and Answer to a Notice of Violation, should be addressed to: George Wilson, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region II, the NRC Resident Inspector at the facility that is subject to this Notice, and the Document Control Center, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

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

Dated this 19th day of November 2019.

QUESTIONS?

If you have questions, please visit <https://www.nrc.gov> and search for "License Fees."

Questions may also be directed to the NRC Accounts Receivable Help Desk by e-mail at FEES.Resource@nrc.gov, by phone at (301) 415-7554, or by writing to the address below:

U.S. NUCLEAR REGULATORY COMMISSION
OCFO/DOC/ARB
Mail Stop T9-E10
Washington, DC 20555-0001



Payment Methods

U.S. NUCLEAR REGULATORY COMMISSION
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NUREG/BR-0253, Rev. 8
February 2015



APPROVED BY OMB: NO. 3150-0190

Estimated burden per response to comply with this voluntary collection request: 10 minutes. This brochure provides information about available payment methods. Forward comments about burden estimate to the Records Management Branch (T6-F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0190), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

NRC accepts the methods described below.

PAYMENT BY AUTOMATED CLEARINGHOUSE

To pay by Automated Clearinghouse / Electronic Data Interchange (ACH/EDI), provide a copy of NRC Form 628 to your financial institution. You may obtain a copy of NRC Form 628 by calling the NRC Accounts Receivable Help Desk at (301) 415-7554.

PAYMENT BY CREDIT CARD

The NRC is currently accepts credit card payments of up to \$24,999.99. For payment by credit card, go to Pay.gov, search for "U.S. Nuclear Regulatory Commission Fees" and enter the required information.

You may also mail or fax NRC Form 629 following the directions on the form. To obtain a copy of NRC Form 629 go to <http://www.nrc.gov> and search for "NRC Form 629" or call the NRC Accounts Receivable Help Desk at (301) 415-7554.



PAYMENT BY FEDWIRE DEPOSIT SYSTEM

The NRC can receive funds through the U.S. Department of the Treasury (Treasury) Fedwire Deposit System. The basic wire message format below complies with the Federal Reserve Board's standard structured third-party format for all electronic funds transfer (EFT) messages.

See the sample EFT message to Treasury below. Each numbered field is described below.

The diagram shows a structured EFT message format. Field 1 is the Receiver DFI# (021030004). Field 2 is the Type-Subtype-CD. Field 3 is the Sender DFI# (TREAS NYC/CTR). Field 4 is the Sender REF# (BNF=AC-31000001 081=). Field 5 is the Amount (\$). Field 6 is the Agency Location Code (ALC). Field 7 is the Product Code (CTR). Field 8 is the Agency Name (TREAS NYC). Field 9 is the Third-Party Information (OBI=). Field 10 is the Free-Form Text.

1 RECEIVER-DFI# – Treasury's routing number for deposit messages is 021030004.

2 TYPE-SUBTYPE-CD – The sending bank will provide the type and subtype code.

3 SENDER-DFI# – The sending bank will provide this number.

4 SENDER-REF# – The sending bank will insert this 16-character reference number at its discretion.

5 AMOUNT – The transfer amount must be punctuated with commas and decimal point; use of the "\$" is optional. The depositor will provide this item.

6 SENDER-DFI-NAME – The Federal Reserve Bank will automatically insert this information.

7 RECEIVER-DFI-NAME – Treasury's name for deposit messages is "TREAS NYC". The sending bank will enter this name.

8 PRODUCT CODE – A product code of "CTR" for customer transfer should be the first item in the receiver text field. Other values may be entered, if appropriate, using the American Bankers Association's options. A slash must be entered after the product code.

9 AGENCY LOCATION CODE (ALC) – THIS ITEM IS OF CRITICAL IMPORTANCE. IT MUST APPEAR ON THE FUNDS TRANSFER DEPOSIT MESSAGE IN THE PRECISE MANNER AS STATED TO ALLOW FOR THE AUTOMATED PROCESSING AND CLASSIFICATION OF THE FUNDS TRANSFER MESSAGE TO THE AGENCY LOCATION CODE OF THE APPROPRIATE AGENCY. The ALC identification sequence can, if necessary, begin on one line and end on the next line; however, the field tag "BNF=" must be on one line and cannot contain any spaces. The NRC's 8-digit ALC is: BNF=AC-31000001

10 THIRD-PARTY INFORMATION – The Originator to Beneficiary Information (OBI) field tag "OBI=" signifies the beginning of the free-form third-party text. All other identifying information intended to enable the NRC to identify the deposit—for example, NRC annual fee invoice number, description of fee, 10 CFR 171 annual fee, and licensee name—should be placed in this field.

The optimum format for fields 7, 8, 9, and 10 using an 8-digit ALC is as follows:

TREAS NYC/CTR/BNF=AC-31000001 OBI=

The optimum format, shown above, will allow 219 character positions of information following the "OBI=" indicator.

If the licensee's bank is not a member of the Federal Reserve System, the nonmember bank must transfer the necessary information and funds to a member bank, which then must transfer the information and funds to the local Federal Reserve Bank.

For a transfer of funds from local Federal Reserve Banks to be recorded on the same day, the transfer must be received at the New York Federal Reserve Bank by 4 p.m., EST. Otherwise, the deposit will be recorded on the next workday.

PAYMENT BY CHECK

Checks should be made payable to the U.S. Nuclear Regulatory Commission with the invoice number, Enforcement Action number, or other information that identifies the payment, written on the check. Mail the check to the following address:

U.S. Nuclear Regulatory Commission
U.S. Bank
P.O. Box 979051
St. Louis, MO 63197-9000

FedEx or overnight mailings must be delivered to the following address:

U.S. Nuclear Regulatory Commission
U.S. Bank Government Lockbox
SL-MO-C2GL
1005 Convention Plaza
St. Louis, MO 63101

TAXPAYER IDENTIFICATION NUMBER

You must file your Taxpayer Identification Number (TIN) with the NRC. Use NRC Form 531 to provide your TIN. You may obtain NRC Form 531 from the NRC Web site at <http://www.nrc.gov> by searching for "NRC Form 531" or by calling the NRC Accounts Receivable Help Desk at (301) 415-7554.