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MEMORANDUM FOR: Office Directors
Regional Administrators

FROM: Richard C. DeYoung, Director
Office of Inspection and Enforcement

SUBJECT: NRC MANUAL CHAPTER 0517 "MANAGEMENT OF ALLEGATIONS"

Enclosed is the final draft of NRC Manual Chapter 0517, "Management of Allegations," for your review. The draft was prepared in concert with office Allegation Tracking System (ATS) Coordinators and we have incorporated their comments in the manual chapter. I would appreciate your review and comments by June 8, 1984 so that we can provide the EDO with the final version by July 2, 1984. The IE contact is Ed Fox (x24905).

A handwritten signature in cursive script, appearing to read "R. C. DeYoung".

Richard C. DeYoung, Director
Office of Inspection and Enforcement

Enclosure:
As Stated

cc w/encl:
J. H. Sniezek, EDO
T. A. Rehm, EDO
Office ATS Coordinators

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IE

CHAPTER 0517 MANAGEMENT OF ALLEGATIONS

0517-01 COVERAGE

This chapter and its appendices define the policy and procedures for the proper receipt, processing, control, and disposition of allegations received by NRC offices that concern NRC-regulated activities and the policy and procedures for dealing with individuals who provide information to the NRC.

0517-02 OBJECTIVES

- 021 To establish the policy for the receipt, processing, control, and disposition of allegations and to define procedures by which the receipt, status, and disposition of allegations are tracked, thereby assuring that:
 - a. allegations are properly assigned for processing and assessed for safety significance to permit prioritization and resolution in a timely manner;
 - b. timely and accurate information on all allegations is maintained and made available to NRC Offices and Regions on a need-to-know basis;
 - c. all allegations not resolved by other formal means are processed in accordance with these procedures and the resolution of all allegations is properly documented;
- 022 To assure that individuals making allegations to the NRC are properly treated, provided confidentiality when requested and possible, and notified of the findings concerning the allegation(s).
- 023 To assure that issues raised are promptly and adequately investigated.

Approved:

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0517-03 RESPONSIBILITIES AND AUTHORITIES

031 Executive Director for Operations (EDO)

Sets policy and procedures for the receipt, processing, control, and disposition of allegations and establishes policy for the treatment and confidentiality of those who provide information to the NRC.

032 All Office Directors/Regional Administrators

- a. Establish internal procedures so that all employees are aware of requirements for receipt, processing, control, and disposition of allegations and for the accurate and timely updating of the status of those allegations for which it is the Action Office.
- b. Appoint an Office Allegation Coordinator (OAC) who serves as administrative point of contact for employees and other Offices and the Regions. The OAC will:
 1. Ensure that the appropriate parts of the Allegation Data Form (NRC Form 307, Exhibit 1) are completed for all allegations received within the Office or Region and that the requested data is accurate and timely.
 2. Determine the appropriate Action Office and, if applicable, coordinate with the Office Allegation Coordinator of the affected Office or Region on each allegation received by the Office or Region.
 3. Ensure the appropriate parts of the Allegation Data Form are completed for all allegations for which the Office or Region is the Action Office.
 4. Forward the Allegation Data Form to the respective Action Office OAC when the Office or Region is not the Action Office.
 5. Forward the completed Allegation Data Form to IE OAC and a copy to the responsible headquarters licensing office [Office of Nuclear Reactor Regulation (NRR) or Office of Nuclear Material Safeguards and Security (NMSS)] OAC within 10 working days of receipt of an allegation when the office is the Action Office. (For power reactors, during the period from 30 days prior to the construction completion date until the Commission meeting on full-power authorization, the Receiving Office or Action Office for any allegation will, within 2 working days, telephonically notify the NRR Project Manager of its receipt and the identification of the Action Office in addition to completing the Allegation Data Form.)

6. Acquire input and updates (using an AMS printout) on allegations from the staff within the Office or Region and ensure this information is forwarded to the IE OAC daily for placement into the AMS.
 7. Provide reports as described in Appendix 1, Part IX, 4 and 5.
- c. Determine the safety significance and generic implications of those allegations that fall within the programmatic responsibility of that Office or Region and establish schedules for the processing of allegations with the objective of resolving them prior to a licensing decision date, if applicable.
 - d. Review those allegations for which it is the Action Office for potential board notification and recommend such notification to NRR or NMSS.
 - e. Refer all allegations involving wrongdoing to the Office of Investigations and provide technical assistance to OI for investigating allegations.
 - f. Prior to taking a major action such as a licensing decision or escalated enforcement, review the status of allegations for that project in the Allegation Management System (AMS).

033 Director, Office of Investigations

Investigates allegations of wrongdoing by other than NRC employees and contractors.

034 Director, Office of Inspector and Auditor

Investigates allegations of wrongdoing by NRC employees and contractors.

035 Director, Office of Inspection and Enforcement

- a. Proposes to the EDO for approval agency-wide policy and procedures regarding the processing of allegations exclusive of those that fall under the purview of the Office of Investigations or Office of Inspector and Auditor.
- b. Maintains the AMS and any necessary improvements to modify its capabilities, in coordination with RM.
- c. Resolves technical allegations that involve vendors or that are generic in nature in coordination with NRR or NMSS.

036 Director, Office of Nuclear Reactor Regulation

- a. Reviews allegations in coordination with the Action Office for potential board notification and makes such notification, if required.
- b. Reviews and evaluates allegations for implications on licensing decisions and plant safety in coordination with IE and the Region(s).
- c. Resolves those allegations pertaining to reactor licensing issues.

037 Director, Office of Nuclear Material Safety and Safeguards

- a. Reviews allegations concerning NMSS licensees in coordination with the Action Office for potential board notification and makes such notification if required.
- b. Reviews and evaluates allegations for implications on licensing decisions concerning NMSS licensees in coordination with IE and the Region(s).

038 Office of Resource Management (RM)

- a. Establishes the ADP program and maintains the data base of information in the AMS.
- b. Provides monthly and special reports to Offices and Regions (Exhibits 2 and 3).

0517-04 DEFINITIONS

- 041 Action Office. The NRC Office or Region that is responsible for reviewing and taking action, as appropriate, to resolve an allegation.
- 042 Action Office Contact. The staff member in the Action Office who is assigned the responsibility for resolving an allegation.
- 043 Allegation. A declaration, statement, or assertion of impropriety or inadequacy associated with NRC licensed activities, the validity of which has not been established. This includes all safety concerns identified by sources such as the media, individuals or organizations outside the NRC, and technical audit efforts from Federal, State or local government offices regarding activities at a licensee's site. Excluded from this definition are matters being handled by more formal processes such as 10 CFR 2.206 petitions, hearing boards, appeal boards, etc.

- 044 Allegation Management System (AMS). A computerized information system that contains a summary of significant data pertinent to each allegation.
- 045 Alleger. An individual or organization who makes allegations. The individual or organization may be a concerned private citizen; a public interest group; a licensee, vendor or contractor employee; a representative of a local, State, or Federal agency; or an NRC employee.
- 046 Confidentiality. The term that refers to the protection of data that directly, or otherwise, could identify an alleger by name. It is not intended to deny staff members access to the identity of the alleger when such identification is required by staff members to evaluate and resolve allegations.
- 047 Inquiry. An activity involving minimal effort to determine the appropriate response to information reported to the NRC. Typically, an inquiry entails the use of the telephone or written correspondence rather than formal interviews or other investigative measures; however, formal interviews will be conducted if required.
- 048 Inspection. A routine or special regional activity that may be used to examine and subsequently resolve an allegation.
- 049 Investigation. Formal activities conducted by the Office of Investigations on its own volition, or at the request of the Commission, EDO, or Regional Administrators, with or without technical assistance. The Office of Investigations is the lead Action Office for all investigations involving wrongdoing.
- 050 Office Allegation Coordinator (OAC). A designated staff member in each Office or Region who serves as the administrative point of contact for that Office or Region regarding the disposition of allegations.
- 051 Receiving Office. The Office or Region that initially receives an allegation. In some cases, the Action Office and Receiving Office will be the same if the allegations falls within the functional responsibility of the Receiving Office.
- 052 Safety Significance. A measure of the importance of an allegation relative to its potential impact on the public health and safety.
- 053 Wrongdoing. For the purposes of this manual chapter, it is the deliberate, purposeful, or willful violation of NRC regulations, license technical specifications, or licensee commitments to the NRC.

0517-05 BASIC REQUIREMENTS

- 051 Applicability. The provisions of this chapter and appendices are applicable to, and shall be followed by, all NRC employees.
- 052 Wrongdoing. Allegations of wrongdoing at NRC-regulated facilities, as opposed to those involving technical issues, fall within the purview of the Office of Investigations. The Office or Region will enter allegations of wrongdoing into the AMS using information provided by OI (see Appendix 1, Part IX.2 of this manual chapter). OI will investigate allegations involving wrongdoing and provide either a report or a summary of its findings to the responsible Office or Region. Allegations involving wrongdoing received by a Region will be coordinated by the Region OAC with the OI Field Office Director in that Region and those received by Offices at NRC Headquarters will be coordinated with the OI OAC.
- 053 Action Office Assignments Allegations submitted by any source concerning NRC-regulated activities should be transmitted by the Receiving Office OAC to the OAC in the appropriate Office or Region for disposition.
- 054 Confidentiality. Identity of persons making allegations should not be revealed by the NRC unless it is clear that the individual concerned has no objection. As a general rule the "need to know principle" should be used when dealing with the protection of a person's identity. This means that, in discussions or in documents, the identity of the source must be protected by not referring to the name or expurgating the name from documents before disseminating these to the staff. It must be made clear to all concerned if and on what terms the anonymity of a person making an allegation is to be protected. In every case, the individual should be asked if anonymity is desired. A clear record should be maintained for the files to preclude later misunderstandings. A confidentiality agreement (Exhibit 4) should be executed with the individual, if necessary, and when possible. This agreement can be executed by mail or in person as convenience dictates. If at any time for any reason, confidentiality is breached or jeopardized, Office or Regional management should be informed and the person should be advised, the reason explained and remedial measures taken, if possible.
- 055 Responding to Allegers. Those who provide allegations to NRC staff must be treated with respect, consideration, and tact. Under no circumstances should they be dealt with brusquely or abusively. When allegations are received in writing, a prompt attempt to make personal contact must ordinarily be made in each case. Contact should be earnest and professional. The allexer should be promptly advised of the results of follow-up action and, in instances of unusual delay in providing the results, the person who made the allegation should be advised of the status periodically so that there is an awareness that the allegations are not being ignored.

- 056 Screening of Allegations. Allegations should be screened for significance to safety and the more serious ones should be addressed first. All allegations should be addressed as promptly as resources will allow and as the need is identified. Screening of allegations should be considered diligently to the point where some may be dismissed early in the process for logical reasons (i.e., lack of specificity, lack of safety significance, etc.) to conserve staff resources. Follow-up on allegations, whether they are general or specific, should focus not only on the specific allegation but on the overall area of concern, including the potential for generic implications. In this regard, note that an allegation directed toward a non-safety item or activity may, through generic considerations, affect a safety item or activity.

When a number of allegations point to or reinforce indications of a broader problem, it may be appropriate to assume that such a problem may exist. Prompt action to broaden the scope of the inquiry should then be taken to determine whether or not such is the case. While the safety significance of an allegation is an important factor in determining the extent and promptness of staff resources commitment, it should not affect the staff treatment of the alleged as discussed in section 055, above.

- 057 Timeliness of Resolving Allegations. The Action Office should attempt to resolve all allegations in a manner which is timely and professional in scope and depth. Allegations having relatively high safety significance should be addressed expeditiously. Less significant allegations should be addressed as priorities and resources permit, but usually within 6 months of receipt. If it is appropriate, an inspection should be made. A plant visit with the person making the allegation should be made if necessary and if the individual is willing to make such a visit to find the exact location of a problem. Access issues should be addressed on a case-by-case basis. Travel costs for the individual can be offered, if necessary, and are borne by the Office or Region extending the offer. Care should be taken to avoid embarrassment or abuse of the individual, e.g., schedule visit on off-shift/weekend, etc.

- 058 Involvement of Licensees or Other Affected Organization. For allegations involving a potentially significant impact on the public health and safety, the affected organization should be promptly informed to assure proper and timely action. For other allegations, once information from alleged is received and understood by the Office/Region and if it is deemed appropriate by the Office/Regional Director, the licensee/vendor should be advised specifically by letter of the area of concern and should be requested to address it, subject to further audit by NRC, in order to minimize the expenditure of NRC resources. In all instances, however, confidentiality must not be breached and the effectiveness of investigations/inspections should not be compromised, i.e., premature release or appear to do so. The alleged must be informed that this is not handing a matter over

to the affected organization, but that NRC will review and evaluate the actions of the affected organization and perform independent activities as necessary. The affected organization should be informed regarding this resolution of the allegation if appropriate (See Appendix I Part VIII).

There are two exceptions to the above. The first exception is where the information cannot be released in sufficient detail to be of use to the licensee or vendor without compromising the identity of the confidential source. In such cases release should normally not be made unless the release is necessary to prevent an imminent threat to the public health and safety. The EDO shall be consulted in all cases where it appears there is a need to release the identity of a confidential source. The second exception is where a licensee/vendor could compromise an investigation/inspection because of knowledge gained from the release of information, especially if wrongdoing is involved. The Regional Administrator for inspections and the Director of the Office of Investigations for investigations shall decide whether or not to release the information to avoid compromising NRC action.

It is recognized that when a large number of issues are raised at the same time, as has occurred with several plants as they approach issuance of an OL, the difficulties in executing the above policy are enhanced. However, at such a time, the requirement for a licensee to know where his problem lie is also important. In these cases, it may be necessary to organize a task force, comprised of both office and regional personnel with a senior NRC manager as the task force leader, to resolve these issues within the usual short time frame between the date the issues were identified and the proposed date for issuance of an OL. To conserve NRC resources in resolving these large numbers of issues, the involvement by the licensee except as noted above will be appropriate. A high degree of organization in the initial stages will be required in order to deal with these particular situations and to determine to what extent the licensee should be involved.

- 059 Appendix 1. This appendix provides procedures for receipt, control, processing, and disposition of allegations assigned to NRC Offices or Regions and the procedures and guidelines used to record the receipt, status, and disposition of allegations in the AMS.

END

PROCEDURES FOR SCREENING, ASSESSING, AND
CONTROLLING ALLEGATIONS AND FOR ALLEGATION MANAGEMENT SYSTEM (AMS)

Part I: General

This part establishes procedural guidance for screening, assessing, and controlling allegations that come to the attention of the NRC staff. These functions are to be established within each Region and Office under the control of an individual Office Allegation Coordinator (OAC), or a panel of staff personnel or other appropriate staff technical persons. The Regions and Offices will establish procedures consistent with this guidance and where appropriate provide the required training to ensure that their staffs are fully informed regarding the proper management of allegations.

Allegations pertaining to NRC-licensed facilities and activities may come to the attention of the NRC staff by telephone, letter, news media reports, or by direct verbal contact at sites, in offices, at meetings, and even at social functions. All allegations, no matter how originated, are subject to processing in accordance with this manual chapter. It is imperative that allegations be recognized as such by staff members and processed professionally, promptly, and with consistent treatment.

It is very important to note that where safety is involved, the NRC does not recognize the term "off-the-record." Allegers who wish to provide off-the-record information must be clearly advised that information important to safety cannot be treated off the record, but that the information will be accepted officially and acted upon as necessary. The name of the alleged will be protected, however, if requested under the rules of confidentiality.

Any employee who receives an allegation must be aware that it is essential to protect the identity of the alleged if such anonymity is requested or inferred by his/her actions. To this end, coordination with the appropriate Office or Region allegation coordinator must comply with the principle of "confidentiality," which is discussed separately.

NRC employees, particularly resident and regional inspectors, regional supervisors, and investigation/allegation coordinators who are expected to receive the majority of allegations, should become fully familiar with the prescribed policies and procedures to ensure that the required actions are performed.

It is the responsibility of all employees who receive allegations to take whatever steps are necessary to ensure that an appropriate allegation coordinator is promptly informed. Whenever possible, the person making the allegation should be referred to either the OAC, other individuals as designated by the Region or Office, or arrangements should be made for the OAC or designated staff member to recontact the individual.

Part II: The Office Allegation Coordinator (OAC)

1. The initial responsibility of the OAC is to identify the proper Action Office to which the allegation should be assigned for evaluation and resolution in coordination with other OAC's (either in the Offices or Regions).
2. The OAC serves as a focal point for administrative processing and control of all allegations received by the Regions and Offices. The OAC is responsible for tracking allegations from initial receipt to final resolution. The OAC assures establishment and maintenance of files that clearly identify allegations received by the Region or Office and documents actions initiated to resolve such matters. The OAC ensures that management and cognizant staff are informed of allegations under their purview, kept current on the status of such allegations by providing accurate and timely information to the AMS, and briefed on the proposed final resolution of allegations. The OAC also ensures that the final resolution is properly documented.
3. The OAC assists technical staff members who are reviewing allegation information, primarily in the form of coordinating activities necessary to resolve issues. In addition, the OAC may assist in the formulation of a course of action to resolve issues.
4. A panel, which includes the OAC as a member, may be designated with the primary responsibility to ensure that all allegations are promptly assigned, properly evaluated, and the actions taken to resolve the allegation, as well as the findings, are properly documented and transmitted to the allogger and the affected organization as appropriate.

Part III: Receipt of an Allegation

1. Allegations Received by Telephone or Personal Visit

Any NRC employee who receives a telephone call from someone who wishes to make an allegation should have the caller transferred to the OAC or appropriate technical staff member in the Office or Region. Likewise, if an individual appears in person at an NRC Office, the individual should be referred to the OAC or other technical staff member. Technical employees, when unable to refer the telephone call or the visitor as described, shall obtain as much information as possible from the individual (see item 3, below). When unable to locate the OAC or other technical staff member, administrative employees should refer an individual to a technical staff supervisor.

2. Allegations Received by Mail

Personnel responsible for distribution of mail will forward correspondence that appears to contain an allegation to the OAC. Both letters and envelopes will be forwarded and no copies will be made. An employee who receives direct correspondence, including internal NRC memoranda, that contains allegations shall forward the correspondence to the OAC. All personnel who may come into possession of this type

of correspondence also should be made aware that correspondence containing confidential source information should be transmitted in a sealed envelope marked "To Be Opened by Addressee Only;" for expedited transmittals (e.g., electronically), confidential source information should be deleted from correspondence.

3. Discussions with Allegor

Any employee receiving a telephone call or visit, as discussed in item 1, shall attempt to obtain as much information as possible from the individual. It is crucial to identify:

- a. full name
- b. complete mailing address
- c. telephone number where the individual may be contacted
- d. position or relationship to facility or activity involved
- e. nature of allegation

If the allegor declines to provide the above information, attempt to establish the reason(s) using the following guidance:

If the allegor is concerned about protecting his/her identity, inform the individual that if so requested, his/her identity will be kept confidential. Explain further, if necessary, that Public Law 95-601 affords protection to the allegor by prohibiting an employer from discriminating against an employee for contacting the NRC.

The allegor may be informed that the NRC employee with whom he/she is in contact does not have the capability to evaluate the information, to determine follow-up action, or to establish NRC jurisdiction; therefore, it may be necessary that someone else contact the allegor for additional information.

The allegor should be informed also, that--and unless an objection is registered--he/she will be recontacted as soon as possible regarding the allegation. This may be done by telephone, personal visit, or by a letter to the allegor, at an address designated, which will also acknowledge the receipt of the allegation. This process will permit the allegor to review the information with the NRC to provide maximum assurance that the information has been correctly interpreted and understood.

If the allegor persists in not offering identification after the above explanations, document the allegation in as much detail as possible and advise the allegor that he/she may contact the OAC or designated staff member in 30 days or any other agreed upon period, for information on the status of any actions being taken on the information supplied.

Part IV: Action by the Receiving Employee and
the Office Allegation Coordinator (OAC)

1. When an allegation is received, the Receiving Office OAC or the employee receiving the allegation will complete an NRC Form 307, Allegation Data Form. Until direct input/update capability is provided

to the Regions and Offices, a copy of the completed form will be forwarded to the IE OAC and one copy to the NMSS or NRR OAC depending on the issue. NRC Form 307 serves as notification to NMSS and NRR that an allegation has been received and is being entered in the AMS in accordance with these procedures. All allegations must be entered in the AMS. In this way an "audit trail"--will be established so that NRC actions can be properly monitored and closed.

2. The Action Office OAC or other designated staff member will ensure that the alleged is properly contacted to acknowledge receipt of the allegation and to confirm the specifics of the allegation. Depending on the nature of an allegation, the OAC will provide copies of the allegation documentation and the letter sent to the alleged (with the alleged's identity concealed) to the cognizant technical staff supervisor for evaluation and initiation of action. Such copies also will be forwarded to the cognizant OI Field Office or to Headquarters for information. When responsibility for the handling of an allegation is transferred from one organizational unit to another, the alleged should be notified of the new point of contact (name and telephone number) by the individual who is relieved as contact in order to assure continuity. A single point of contact should be the rule.

The OAC will follow up on the allegation with the cognizant technical staff supervisor at periodic intervals until the matter has been satisfactorily resolved. When case is closed, an entry should be made to that effect in the AMS.

3. The OAC will coordinate allegation information with the technical staff and may assist in determining whether the information is sufficient to identify the issues. If the information is determined to be insufficient, the OAC or designated staff member will assist in further contact with the alleged. A single point of contact with an alleged provides a means of better controlling communications, aids in developing rapport, establishes continuity in the flow of information between the Regions and other NRC Offices, and aids in protection of the alleged's identity.
4. The OAC assists the cognizant technical staff in identifying and separating the issues involved in an allegation into one of the following categories:
 - a. Allegations that involve purely technical matters, such as: inadequacies in procedures, qualifications, or training; inadequate implementation of procedures; or inadequate corrective actions; or overexposure(s) to radiation.
 - b. Allegations that involve wrongdoing such as: record falsification; willful or deliberate violations; material false statements; or other improper conduct.
 - c. Allegations that involve matters outside the jurisdiction of NRC.

5. Technical issues in category 4a involving failure to meet requirements have the potential for being willful or deliberate violations. However, in the absence of specific allegations of willfulness or deliberateness, such issues will normally be tracked separately as technical issues and resolved using inspection program resources. If an allegation covers issues that affect other Regions or Offices, follow-up activities will be coordinated with the affected Offices and a Lead Office will be designated. The OAC will contact the affected Offices which will, in most cases, agree mutually as to which Office or Region should have the lead. If agreement cannot be reached at the OAC level, then the Regional Administrators or Office Directors will resolve which Office or Region should take the lead.
6. Allegations in category 4b, should be referred to OI Field or Headquarters personnel.
7. When applicable and after coordination, the Action Office should notify other agencies such as the Department of Labor, and the Occupational Safety and Health Administration, DOE, etc. in dealing with allegations in category 4c. Notification to other Federal law enforcement agencies of possible criminality or nationally significant information contained in allegations should be coordinated first with the appropriate OI Field Office and the Office of Inspector and Auditor.
8. If an allegation is determined to have generic implications, other Offices and/or Regions with responsibilities that may be affected will be appropriately notified by the Action Office.
9. Information regarding suspected improper conduct by NRC employees will be brought to the attention of appropriate management for possible referral to the Office of Inspector and Auditor (OIA).

Part V: Documenting Allegations

1. When an allegation is received and the action office identified, a case file should be established to contain all related documentation concerning the allegation, including summaries of telephone conversations, discussions, and meetings. To ensure proper evaluation, as much information as possible should be documented about each allegation. In addition to obtaining basic information, attempts should be made to expand and clarify the information so that the issue is relatively well defined. All allegations, regardless of source or how received, must be documented.
2. There will be occasions when the allegations obviously have no substance and appear to represent a distortion of facts. However, even in these cases, documentation is necessary that identifies the contact, the general content of any communications, and the basis for a conclusion that the matter need not be pursued. Instances such as these will be coordinated with the appropriate technical staff by the OAC to ensure proper disposition.

3. The importance of obtaining and documenting all pertinent information about an allegation cannot be overemphasized. Evaluation and screening of the allegation as well as the proposed course of action that will be initiated to resolve the issue, will be based primarily on this information. In some cases, a personal interview with the alleged may be warranted. In these cases, the OAC will consult with NRC management to determine the best way to obtain the details required. Depending on the nature of the allegation and the time sensitivity, assistance from the Office of Investigations (OI) or other resources may be requested.
4. As soon as possible after receiving an allegation or becoming aware of information that indicates inadequate or improper activities, the person receiving the allegation shall notify the OAC. Normally, no actions will be taken to verify the validity of the allegations, nor shall such matters be discussed with licensees, if necessary, until after the OAC or designated staff member has briefed appropriate NRC management.
5. The OAC is responsible for reviewing all information received in conjunction with an allegation and for ensuring that management and cognizant technical staff members are fully informed.
6. Allegations normally should not be addressed in Preliminary Notifications (PNs) or Daily Reports (DRs); however, if it is determined that PN or DR entries are appropriate, the approval of an Office Director or a Regional Administrator should be obtained.
7. If allegation documents must be sent to other NRC personnel, they should be appropriately handled to protect the identity of the alleged. The alleged's identity should not be released unless there is a "need to know."

Part VI: Evaluation by Cognizant Technical Staff

1. When an allegation package is received, the technical staff within the Office or Region will review the documentation to determine if there is a safety concern that requires immediate action. The technical staff is responsible for development, initiation, and followthrough on corrective actions. Allegations or documents containing a substantial number of allegations once entered in the AMS can be screened using the following criteria:
 - a. Is there an immediate safety concern which must be quickly addressed?
 - b. Is the allegation a specific safety or quality issue or a generalized concern?
 - c. Has the staff previously addressed this issue?
 - d. Determine whether the allegation package contains sufficient information for a thorough evaluation. If it does not, identify the additional information that is needed.

- e. Determine whether all aspects of the allegation are adequately defined and described to permit or require a meaningful and extensive evaluation. This is a screening process that may result in a decision to not consider the allegation further. If the latter is the decided course of action, the allexer should be so informed in a courteous and diplomatic manner along with the rationale for not considering it further. The potential for adverse publicity must be recognized when taking this action.
- f. Determine whether the identity of the allexer is necessary for a thorough evaluation.
- g. Determine what specific issues are involved in the allegation and whether the issues can be adequately addressed by a technical inspection.
- h. Determine if the allegation can be examined and resolved during a routine, scheduled inspection. If this is not possible, determine the best way to address the issues.
- i. Determine whether licensee/vendor resources can reasonably be used in resolving the allegation to conserve staff resources. Consider potential problems associated with "turning the issue over to the licensee."
- j. Determine whether the allegation has the potential to require escalated enforcement action.
- k. Determine the time sensitivity of the allegation, and what immediate actions are necessary.
- l. Determine whether investigative assistance will be needed.
- m. Identify peripheral issues that could develop.
- n. Consider if any licensing actions or board proceedings are pending which could be influenced or affected by the allegation. When an allegation involves a case pending before a licensing or appeal board or the Commission, information concerning it should be provided to NRR or NMSS as soon as possible to assist in the determination of whether or not a board notification should be made.
- o. Determine if other NRC Offices that may have an interest should be notified.
- p. Within 30 days of the receipt of an allegation, the Action Office will make a preliminary determination of the safety significance of the item and the need for regulatory action. (Similar to the approach to the review of Section 2.206 petitions.)
- q. Establish a schedule for the resolution of each allegation which is consistent with the licensing schedule, if applicable.

- r. Notify the OAC or designated staff member when status changes or action(s) is complete.
2. It is the responsibility of the technical staff within the Office or Region to resolve each allegation that falls under its jurisdiction, and subsequently, to notify the OAC or designated staff member of the action taken so that the status of each allegation can be tracked to closeout. Final resolution of an allegation shall be documented and placed in a case file along with all supporting documentation. The final report should state the facts clearly, in a style that does not belittle or disparage the alleged.
3. For those allegations resulting in the need for corrective action, the affected organization shall be properly informed. One vehicle for accomplishing this for reactor facilities is a 10 CFR 50.54(f) letter, for material licensees a 10 CFR 30.32(b) letter, and for fuel fabricating licensees a 10 CFR 70.22(d) letter.

Part VII: Allegation Resolution Documentation

1. At the completion of the allegation resolution process, the case file contents may be destroyed provided appropriate documents have been placed in the NRC records system (PDR, LPDR, docket file, subject files, DCS). Appropriate documents to be retained include those necessary for an individual to understand the incoming allegation and its resolution. Any records so disseminated must be treated to protect the identity of the alleged.
2. A final report should be prepared that sets forth the facts about the allegation and findings clearly and conclusively. The final report can be a memorandum for a relatively minor matter, an investigation/inspection report or a technical paper for a complex or major generic matter. It should not contain the name or material that could be used to identify the alleged.
3. The final report should include a summary of the concern, a description of the evaluation performed and the conclusions drawn. It should be written in a style that does not belittle or disparage the alleged.
4. Appropriate entries should be made to the AMS to close out the allegation.

Part VIII: Dissemination of Final Report

1. A copy of the final report shall be sent to the alleged and, if appropriate, to the affected outside organization(s). A transmittal memorandum may be needed to summarize the matter.
2. As in Part VII.1 above, copies of the final report shall be placed in the NRC records system, and should be treated so as not to reveal the identity of the alleged.

PART IX: ALLEGATION MANAGEMENT SYSTEM1. General

- a. For purposes of the Allegation Management System (AMS) the definition provided for an allegation is very general and broad. The significance or nonsignificance of an allegation will be judged during the Action Office review and follow-up of the allegation. There is to be no screening of allegations prior to entering them into the system (except of course for duplication of entries). The AMS should provide a vehicle for collecting, storing and retrieving all key information regarding all allegations. The Action Office determines the necessary action to be taken based upon the specifics of the case. Some allegations may be received and closed out the same day.
- b. The AMS provides basic descriptive and status information and serves as a referral system. It identifies the office and staff to contact for more specifics on an allegation. Additionally, it keeps the staff informed as to how the allegation was resolved and provides reference to the close out documentation.
- c. When an allegation is received, it is not necessary to identify by separate entry into the AMS every component or subset of the allegation. For example, if an allegation is received that consists of 15 separate concerns of wrongdoing and technical deficiencies, the allegation may be entered as one allegation. However, the description of the allegation should include the number of separate concerns and their subject area. In some cases there may be a distinct grouping of concerns, for example, in two areas such as training and quality assurance. In such a case it may be appropriate to enter two allegations. A main objective is to ensure that the receipt of an allegation is entered and tracked in the system. An allegation is not completed and closed until an Action Office supervisor determines that appropriate action has been taken.
- d. Sensitive information such as the names of persons making allegations shall not be entered in the system. All information entered on the form shall be unclassified and shall not contain any safeguards information or any proprietary or commercial (2.790) information.
- e. Some allegations may require action by two or more offices. For purposes of entering the allegation into the AMS either separate entries should be made for each Action Office for their assigned action or one entry may be made with the involved Action Office Coordinators agreeing on the lead Action Office for follow-up of the allegation. If another Office is involved in responding to an allegation, it should be so indicated in the "remarks" section.

2. Interaction with the Office of Investigations

- a. The Office of Investigations will continue to investigate all allegations of wrongdoing and will forward all allegations of a technical nature to the appropriate Office or Region. The Office or Region will be responsible for entering all allegations--even those under the purview of OI--into the AMS using a Region or Office AMS number.
- b. For those allegations of wrongdoing received by the Region or Office
 - (1) The Region or Office OAC will coordinate with the OI Field Director or OI Headquarters representative to determine if sensitive information is included which should not be placed into the AMS. All sensitive information is to be deleted and the word "sensitive" put in its place. However an attempt should be made to provide descriptive material to assist the AMS user to the maximum extent possible.
 - (2) The Region or Office OAC will assign a Region or Office AMS number. The OI assigned number should be entered in the AMS as a cross-reference.
 - (3) The name and phone number of the OI Field Director or OI Headquarters representative will be placed in the appropriate sections of the form as the Action Office contact.
 - (4) The OI Field Director will keep the Region or Office OAC apprised of the status of the allegation investigation and provide timely information necessary to determine the safety significance of the allegation to appropriate Regional or Office management and for use in updating the AMS.
 - (5) The allegation will be considered closed when the investigation report has been issued and as long as no technical issues remain. If technical issues remain, the allegation remains open, reference is made to the OI investigation report, and a schedule for resolution of the allegation is placed in the Allegation Data Form or in the AMS update.
- c. For allegations of wrongdoing received by OI, the OI Headquarters or Field Director will coordinate with the respective Office or Region OAC to complete the items 2.b(1) through (5), above.
- d. For allegations of a technical nature received by OI, the OI Headquarters or Field Director will contact the respective Office or Region and follow the procedures as indicated in item 3 below, for the Receiving Office.

3. Receiving Office

Upon receipt of an allegation involving an NRC-regulated activity, the person receiving the allegation or technical staff member of the Receiving Office should:

- a. Complete the appropriate parts of the Allegation Data Form (NRC Form 307). Exhibit 1 is the Allegation Data Form and specific instructions for completion of the form are contained on the reverse side.
- b. Forward the Allegation Data Form to the OAC in the Receiving Office.

The Receiving Office OAC should:

- a. Determine the appropriate Action Office, coordinate with the Action Office, and receive concurrence from the Action Office before transfer of responsibility.

4. Action Office. Action Offices for allegations will:

- a. Complete that portion of the Allegation Data Form marked "Action Office," assign an allegation number to it, and forward a copy of the form to the IE OAC for entry in the AMS, and to the NRR or NMSS OAC, as applicable, within 10 working days of the date of receipt of the allegation for information.
- b. Provide AMS updates to IE OAC on a monthly basis by indicating updates on the previous month's status report. Updates are due to IE by the 25th of each month. All input to IE for the AMS should be sent in "addressee only" envelopes to, "Allegation Management System, Program Support and Analysis Staff (E/W-W 359). Completion of the follow-up action for an allegation will be recorded by updating the monthly status report. Name and telephone of Office or Regional Allegation Coordinators will be indicated at the top of the update sheets; any changes in the designation of OACs will be made here.
- c. Within 30 days of receipt of an allegation, make and document a preliminary determination of safety significance and the need for any regulatory action (similar to the approach to the review of \$2.206 petitions).
- d. Schedule the resolution of each allegation to be consistent with the licensing schedule and the safety significance of the allegation.
- e. Recommend positive and negative board notifications to NRR or NMSS. If the initial board notification is preliminary in nature, a follow-up notification is sent to boards when evaluation is completed, or whenever significant relevant information is identified during the course of evaluating the allegation.

- f. Develop and maintain case files for each allegation, which will include documentation of all preliminary and final resolutions.
 - g. Provide status information to the IE OAC for the AMS regarding items c-f, above.
 - h. Thirty days prior to the construction completion date (applicant's estimate) for each pending OL, each Action Office will forward to the Division of Licensing, NRR an evaluation of the safety significance of all allegations not scheduled to be resolved before the construction completion date, with a recommendation as to whether any or all of them constitute grounds for delaying issuance of (or otherwise restricting) an operating license.
 - i. Thirty days prior to a Commission decision on authorizing full-power operation, a report similar to item h, above will be prepared.
 - j. Ensure protection of the identity of all allegeders when confidentiality is requested or implied by their actions.
5. IE OAC
- a. Upon receipt of an Allegation Data Form and updates, the IE OAC will perform a quality check and will transmit the information to the Office of Resource Management (RM) for input into the AMS. This procedure will be modified when direct input or update capability to the AMS can be obtained for Offices and Regions.
 - b. IE will coordinate with RM to provide monthly status reports during the first week of each month. The monthly report will include a list of all open allegations and a list of those allegations closed during the last 30 days. The format for the status report is provided (Exhibit 3).

NRC Form 307

ALLEGATION DATA FORM

Receiving Office	1.			ALLEGATION NUMBER: _____ - A - _____
	2.	FACILITY:		
		Name	Unit No.	Docket No.
	a. _____ b. _____ c. _____	_____	_____	
Action Office	3.	TYPE OF REGULATED ACTIVITY:		
		<input type="checkbox"/> a. Reactor <input type="checkbox"/> b. Vendor <input type="checkbox"/> c. Materials <input type="checkbox"/> d. Safeguards <input type="checkbox"/> e. Other		
	4.	MATERIALS LICENSE NUMBER: _____		
	5.	FUNCTIONAL AREA(s):		
		<input type="checkbox"/> a. Operations <input type="checkbox"/> b. Construction <input type="checkbox"/> c. Safeguards <input type="checkbox"/> d. Transportation <input type="checkbox"/> e. Emergency preparedness <input type="checkbox"/> f. Onsite health and safety <input type="checkbox"/> g. Offsite health and safety <input type="checkbox"/> h. Other		
	6.	DESCRIPTION: _____ _____ _____		
	7.	NUMBER OF CONCERNS: _____		
	8.	SOURCE:		
		<input type="checkbox"/> a. Contractor employee <input type="checkbox"/> b. Licensee employee <input type="checkbox"/> c. NRC employee <input type="checkbox"/> d. Former employee <input type="checkbox"/> e. News media <input type="checkbox"/> f. Private citizen <input type="checkbox"/> g. Organization <input type="checkbox"/> h. Other		
	9.	CONFIDENTIALITY REQUESTED: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Implied		
	10.	DATE ALLEGATION RECEIVED: ____/____/____		
	11.	EMPLOYEE/OFFICE RECEIVING ALLEGATION: _____		
	12.	ACTION OFFICE CONTACT/PHONE: _____		
	13.	SAFETY SIGNIFICANCE: <input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/> None		
	14.	BOARD NOTIFICATION RECOMMENDED: <input type="checkbox"/> Yes <input type="checkbox"/> No		
	15.	OI NOTIFIED: <input type="checkbox"/> Yes <input type="checkbox"/> No		
	16.	STATUS:		
		<input type="checkbox"/> Open <input type="checkbox"/> Closed Scheduled Completion Date: ____/____/____ Date Closed: ____/____/____		
17.	WAS ALLEGATION SUBSTANTIATED: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially			
18.	WAS ENFORCEMENT ACTION TAKEN: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In Process			
	SEVERITY LEVEL: <input type="checkbox"/> I <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV <input type="checkbox"/> V			
19.	WAS INVESTIGATION PERFORMED: <input type="checkbox"/> Yes <input type="checkbox"/> No			
20.	DID DISPOSITION RESULT IN LETTER TO MODIFY OR REVOKE LICENSE:			
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 50.54(f) <input type="checkbox"/> 30.32(d) <input type="checkbox"/> 70.22(d) Disposition:			
21.	ALLEGOR NOTIFIED OF CLOSEOUT: <input type="checkbox"/> Yes <input type="checkbox"/> No			
22.	REMARKS: _____ _____ _____			
Licensing	23.	CROSS REFERENCE: _____		
	24.	PROJECT MANAGER/PHONE: _____		
	25.	APPLICANT'S CONSTRUCTION COMPLETION DATE: ____/____/____		
	26.	BOARD NOTIFICATION ISSUED: <input type="checkbox"/> Yes <input type="checkbox"/> No		

INSTRUCTIONS

1. Allegation Number
Action Office fill in the boxes to uniquely identify this allegation
OFFICE official NRC office abbreviation for the Office responsible for followup activities.
YEAR last two digits of the calendar year in which the allegation was reported to NRC.
A identifies this number as an allegation number.
NUMBER sequential number assigned by the Office responsible for the followup activities.
EXAMPLE The 24th allegation received by IE in 1982 would be shown as IE-82-A-0024
2. Facility(ies) Involved
Give the name of the facility(ies) or company(ies) about whom the allegation is made. Write the docket number, if appropriate, in the spaces to the right. If the allegation is made about a specific individual or if the information in this item is otherwise sensitive, write SENSITIVE. If more than three facilities or companies are involved write GENERIC.
6. Description
Briefly describe the allegation (1 or 2 sentences). Be concise. If an allegation includes several instances of technical deficiencies or wrongdoing, list the assertions separately or group them by type.
NOTE: If the description of the allegation is sensitive, write only SENSITIVE.
7. Number of Concerns
Write the total number of concerns given in the allegation.
8. Source
Check the box that most clearly describes the affiliation. DO NOT include the name of the individual making the allegation.
9. Confidentiality Requested
Indicate whether confidentiality has specifically been requested or only implied.
13. Safety Significance
Provide an estimate of the safety significance of allegation
Example (a) Check "high" for an alleged deficiency in an operating plant that could have an immediate and great effect on public health and safety
(b) Check "Low" for an alleged deficiency in a plant under construction that would have a minor effect on public health and safety
20. Did Disposition Result in Letter to Modify or Revoke License
Check appropriate box(es) and briefly describe method of disposition (e.g., letter, technical report, inspection report, etc.)
22. Remarks
Include additional information as appropriate.
EXAMPLES: list other allegations related to this allegation; list other NRC offices responsible for followup activities on this allegation.
23. Cross Reference
Identify other related allegations and investigations by alpha-numeric designation.
25. Applicant's Construction Completion Date
For plants under construction, enter the applicant's estimated construction completion date; there is no need to provide this information until 3 or 4 months prior to the estimated date.
26. Board Notification Issued
Indicate whether a board notification was issued.

Approved:

E1-2

R-1246138

RUN DATE: 05/01/84

STATISTICAL SUMMARY
APRIL 1984

<u>OFFICE</u>	<u>ALLEGATIONS RECEIVED DURING THE MONTH</u>	<u>ALLEGATIONS CLOSED DURING THE MONTH</u>	<u>ALLEGATIONS OPEN AS OF THE END OF THE MONTH</u>	<u>OPEN ALLEGATIONS 90 DAYS OLD OR OLDER</u>	<u>TOTAL NUMBER OF ALLEGATIONS IN THE SYSTEM (CUMULATIVE)</u>	<u>TOTAL NUMBER OF ALLEGATIONS CLOSED (CUMULATIVE)</u>
IE	0	0	3	1	7	4
NRR	1	0	4	3	7	3
OI	0	0	91	91	103	02
RI	3	0	101	69	156	54
RII	7	28	69	42	195	126
RIII	10	4	71	43	231	159
RIV	0	0	87	60	130	43
RV	0	3	78	47	132	52
<hr/>						
TOTALS	21	35	504	356	961	453

Approved:

E2-1

LIST OF ALL ALLEGATIONS

<u>FACILITY NAME</u>	<u>ALLEGATION NUMBER</u>	<u>CONTACT</u>	<u>FIS PHONE</u>	<u>STATUS</u>
AMERICAN TESTING LABS	OIR4-83-A-0043	RK HERR	728-8110	OPEN
AMERICAN TESTING LABS	RIV-83-A-0023	TF WESTERMAN	728-8100	CLOSED
AMERSHAM CORP	RII-84-A-0026	B URYC	242-4193	OPEN
ARKANSAS 182	RIV-84-A-0001	TF WESTERMAN	728-8100	OPEN
ARKANSAS 182	RIV-84-A-0041	TF WESTERMAN	728-8100	OPEN
ARMED FORCES RADIOBIOLOGY RES INST	RI-83-A-0089	JD KINNEMAN	488-1252	OPEN
ARNO/DAP CORP, MICHIGAN CITY, IN	*RIII-84-A-0013	DJ SRENIAWSKI	388-5611	CLOSED
ATLANTIC CITY MEDICAL CENTER	RI-84-A-0024	JE GLENN	488-1260	OPEN
ATLANTIC NUCLEAR SERVICES	RII-83-A-0107	GA TODD	242-4193	CLOSED
AUBURN STEEL MILL	RII-83-A-0015	GA TODD	242-4193	CLOSED
BAHNSON, INC.	RII-84-A-0049	B URYC	242-4193	CLOSED
BARCLAY INTERNATIONAL	RIV-83-A-0002	TF WESTERMAN	728-8100	OPEN
BASIC ENGINEERS NATIONAL VALVE, PA	*IE-84-A-0003	EW MERSCHOFF	492-4572	OPEN
BAYTOWN INDUST X-RAY CONST CO	RII-83-A-0023	GA TODD	242-4193	CLOSED
BEAVER VALLEY 1	RI-83-A-0074	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 1	RI-83-A-0080	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 1	RI-83-A-0084	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 1	RI-84-A-0006	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 1	RI-84-A-0007	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 2	RI-83-A-0088	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 2	RI-84-A-0009	LE TRIPP	488-1227	OPEN
BEAVER VALLEY 2	RI-84-A-0043	LE TRIPP	488-1358	OPEN
BECHTEL	RIV-83-A-0035	TF WESTERMAN	728-8100	CLOSED
BELLEFONTE 1	RII-83-A-0039	GA TODD	242-4193	CLOSED
BELLEFONTE 1	RII-83-A-0040	GA TODD	242-4193	CLOSED
BELLEFONTE 1	RII-83-A-0090	GA TODD	242-4193	CLOSED
BELLEFONTE 1	RII-83-A-0122	B URYC	242-4193	OPEN
BELLEFONTE 1	RII-83-A-0123	B URYC	242-4193	OPEN
BELLEFONTE 1	RII-84-A-0001	B URYC	242-4193	OPEN
BELLEFONTE 1	RII-84-A-0009	GA TODD	242-4193	OPEN
BELLEFONTE 1	RII-84-A-0036	JB LANKFORD	242-4194	OPEN
BELLEFONTE 1	RII-84-A-0052	JB LANKFORD	242-4194	CLOSED
BEST INDUSTRIES INC, ARLINGTON VA	RII-84-A-0027	A TILLMAN	242-5613	CLOSED
BETHESDA HOSP, CINCINNATI, OHIO	RIII-83-A-0071	DJ SRENIAWSKI	388-5611	CLOSED
BIG ROCK POINT	RIII-83-A-0067	LR GREGER	388-5644	CLOSED
BKK WASTE DUMP, W. COVINA, CA	RV-84-A-0041	RD THOMAS	463-3763	OPEN
BORG WARNER	RIV-83-A-0029	TF WESTERMAN	728-8100	OPEN
BORIDE PRODUCTS INC	RIV-83-A-0060	RK HERR	728-8110	OPEN
BOVARI ELECTRIC INC	OIR4-83-A-0077	RK HERR	728-8110	OPEN
BPD INDUSTRIES INC, EVANSVILLE, IN	RIII-84-A-0030	DJ SRENIAWSKI	388-5611	OPEN
BRAIDWOOD 1	*RIII-84-A-0016	WS LITTLE	388-5578	OPEN
BRAIDWOOD 182	OIR3-83-A-0059	ET PAWLK	384-2686	OPEN
BRAIDWOOD 182	RIII-84-A-0021	DM HAYES	355-5543	CLOSED

* MULTIPLE FACILITIES ASSOCIATED WITH THIS ALLEGATION NUMBER

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U.S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC-related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

Date _____

Name: _____

Address: _____

Agreed to on behalf of the U.S. Nuclear Regulatory Commission.

Date _____

Signature _____

Name: _____

Title: _____