

March 7, 2011

Mr. Ramon Lugo, III, Director  
NASA Glenn Research Center at Lewis Field  
21000 Brookpark Road M.S. 3-2  
Cleveland, OH 44135

SUBJECT: NRC INSPECTION REPORT 05000030/2011001(DNMS) AND  
05000185/2011001(DNMS) – NASA PLUM BROOK REACTOR FACILITY  
AND NOTICE OF VIOLATION

Dear Mr. Lugo:

On February 10, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed inspection activities at the National Aeronautical and Space Administration (NASA) Plum Brook Reactor Facility, Sandusky, Ohio. The purpose of the inspection was to determine whether decommissioning activities were conducted safely and in accordance with the NRC requirements. Specifically, during an on-site inspection on January 26 – 27, 2011, and subsequent in-office review through February 10, 2011, the inspector evaluated decommissioning performance and conducted independent confirmatory radiation surveys. At the conclusion of the on-site inspection, the inspector discussed the interim inspection results with members of your staff. At the conclusion of the in-office review, a final telephone exit meeting was conducted on February 10, 2011, to discuss the final results with members of your staff.

This inspection consisted of an examination of decommissioning activities at the NASA Plum Brook Reactor Facility as they relate to safety and compliance with the Commission's rules and regulations. Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it was not licensee identified but was identified by the low level radioactive waste disposal site that you were shipping radioactive waste to. The violation involved a failure to prepare all wastes so that the waste was classified according to Title 10 of the Code of Federal Regulations (CFR) 61.55.

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

R. Lugo, III

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compliance was achieved is already adequately addressed on the docket in the enclosed Inspection Report Nos. 05000030/2011001(DNMS) and 05000185/2011001(DNMS).

Therefore, you are not required to respond to this letter unless the description herein 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.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

We will gladly discuss any questions you may have regarding this inspection.

Sincerely,

*/RA/*

Christine A. Lipa, Chief  
Materials Control, ISFSI, and  
Decommissioning Branch  
Division of Nuclear Materials Safety

Docket Nos. 050-00030 and 050-00185  
License Nos. TR-3 and R-93

Enclosures:

1. NRC Inspection Report Nos. 05000030/2011001(DNMS)  
and 05000185/2011001(DNMS)
2. Notice of Violation

cc w/encl: Radiation Health Program Director, Ohio Department of Health (ODH)  
S. Helmer, ODH  
M. Rubadue, ODH  
Division of Planning, Ohio Environmental Protection Agency  
K. Peacock, NASA, Plum Brook Station

R. Lugo, III

-2-

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S. Helmer, ODH  
M. Rubadue, ODH  
Division of Planning, Ohio Environmental Protection Agency  
K. Peacock, NASA, Plum Brook Station

\*See previous concurrence

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Letter to Mr. Ramon Lugo, III from Christine A. Lipa, dated March 7, 2011.

SUBJECT: NRC INSPECTION REPORT 05000030/2011001(DNMS) AND  
05000185/2011001(DNMS) – NASA PLUM BROOK REACTOR FACILITY  
AND NOTICE OF VIOLATION

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## NOTICE OF VIOLATION

National Aeronautics and Space Administration  
Sandusky, Ohio

Docket Nos. 050-00030; 050-00185  
License Nos. TR-3 and R-93

During an U.S. Nuclear Regulatory Commission (NRC) inspection conducted between January 26 and February 10, 2011, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the Code of Federal Regulations (CFR) Part 20.2006(b) requires that any licensee shipping radioactive waste intended for ultimate disposal at a licensed land disposal facility must document the information required on NRC's Uniform Low-Level Radioactive Waste Manifest and transfer this recorded manifest information to the intended consignee in accordance with Appendix G to 10 CFR Part 20. 10 CFR Part 20 Appendix G Section III.A requires, in part, that any licensee who transfers radioactive waste to a land disposal facility shall comply with the requirements in paragraph A.1. Paragraph A.1 of 10 CFR Part 20 Appendix G Section III.A requires, in part, the preparation of all wastes so that the waste is classified according to 10 CFR Part 61.55.

Contrary to the above, on March 5, 2008, the licensee misclassified and certified the waste transferred to a land disposal facility as Class A. As described on the NRC Uniform Low-Level Waste Manifest Form 541, manifest number 9062-03-0001 consisted of 81 containers of waste classified as Class A-Unstable. It was determined that container identification number 1906-OJ-099 exceeded the concentration limit for Class A waste listed in 10 CFR Part 61.55 Table 2. Therefore, the waste was misclassified as Class A.

This is a Severity Level IV violation (Section 6.8).

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, is already adequately addressed on the docket in Inspection Report Nos. 05000030/2011001(DNMS) and 05000185/2011001(DNMS). 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," 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 III, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

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

Dated this 7th day of March 2011.

**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION III**

Docket Nos. 050-00030 and 050-00185

License Nos. TR-3 and R-93

Report Nos. 05000030/2011001(DNMS) and  
05000185/2011001(DNMS)

Licensee: National Aeronautics and Space  
Administration (NASA)

Facility: Plum Brook Reactor Facility  
Test Reactor and Mockup Reactor

Location: Sandusky, Ohio

Date: January 26 – 27, 2011 (on-site)  
through February 10, 2011 (in-office review)

NRC Inspector: Jeremy Tapp, Health Physicist

Approved by: Christine A. Lipa, Chief  
Materials Control, ISFSI, and  
Decommissioning Branch  
Division of Nuclear Materials Safety

**EXECUTIVE SUMMARY**  
**NASA Plum Brook Reactor Facility**  
**Inspection Reports 05000030/2011001(DNMS) and 05000185/2011001(DNMS)**

This routine decommissioning inspection included a review of the licensee's current performance related to decommissioning activities, including radiation surveys. Primary activities observed involved hot work and floor shaving in the reactor building. Areas reviewed included corrective actions, transportation activities, and final status surveys.

**Research and Test Reactor Decommissioning**

Inspector observations of the facility determined that work areas were adequately established to ensure worker safety and that the control of radioactive material areas and wastes were roped off and labeled appropriately.

The inspector determined that the licensee was adequately capturing issues in its corrective action program and the scope and timeliness of corrective actions were commensurate with their safety significance.

The licensee misclassified a waste container in 2008, which resulted in a violation of regulatory requirements. Since that time, the licensee has implemented changes to their program and corrective actions to prevent recurrence. Currently, the licensee's process to ship radioactive waste is being conducted in accordance with an approved procedure, which is consistent with the applicable U.S. Nuclear Regulatory Commission (NRC) and Department of Transportation (DOT) regulations and requirements. A review of subsequent shipments did not identify any errors and all shipments met the applicable regulatory requirements.

**Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors**

The licensee was adequately performing soil excavation and survey activities for the soils to be surveyed in the soil lift station to minimize the potential for blending. The final status surveys performed for the soil lift station excavated soils were in accordance with the applicable survey request and final status survey plan requirements.

The inspector's independent in-process confirmatory survey results for the areas surveyed in the Hot Laboratory building were consistent with the licensee's, and below the approved Derived Concentration Guideline Levels (DCGLs). The inspector concluded that the final status surveys being performed were consistent with the requirements of the applicable survey requests and licensee's final status survey plan.

## Report Details

### **1.0 Research and Test Reactor Decommissioning (69013)**

#### **1.1 Inspection Scope**

The inspector interviewed site personnel, performed facility and site tours, and observed decommissioning activities being performed. The inspector performed a review of corrective actions since July 2010 to evaluate whether the corrective actions were appropriate for the problem reported. The inspector reviewed Problem Number (PN) 401, Radioactive Trash Bags without labels specified by procedure RP-029, dated 7/28/2010; PN 403, Potentially radioactive material found in an uncontrolled area, dated 9/21/2010; PN 404, Improper personnel accountability practices, dated 8/25/2010; PN 405, Clean material dumped into a contaminated area, dated 12/20/2010; PN 406, FSS Survey Design #50 used the wrong DCGL to calculate scan survey action levels, dated 9/21/2010; PN 407, Discrepancies identified during review of shipping radiological surveys, dated 02/9/2011; PN 410, Batch Tank 6 was found to have broken drain valve and had spilled its contents, dated 1/26/2011; and PN 411, One package of Radioactive Material in shipment 9062-03-0001 was found to be misclassified, dated 1/26/2011. As part of the review of corrective actions, the inspector reviewed the 2010 Annual Review of the Plum Brook Reactor Facility Radiation Protection (RP) Program and procedures RP-005, Radiological Surveys, Revision 0; RP-008, Radiological Release of Equipment, Material, and Vehicles, Revision 1; RP-015, Measurement of Gross Alpha and Beta Particles, Revision 0; RP-107, Radiation Protection and FSS/Characterization Training Program, Revision 1; and EW-002, Radioactive Material Packaging and Transportation, Revision 4. The review of these documents provided the verification and details necessary to reach a conclusion on the appropriateness of the licensee's corrective actions.

The inspector reviewed the licensee's process for transportation of radioactive waste through interviews and review of procedure EW-002, Radioactive Material Packaging and Transportation, Revision 4 to determine the transportation activities were being performed in accordance with the applicable NRC and DOT requirements. The inspector also reviewed and evaluated the circumstances surrounding a violation issued by the State of Utah to the licensee for a waste shipment misclassification. As part of that review, the inspector reviewed transportation documentation of waste shipments with manifest numbers: 9062-03-0001, 9062-01-0020, 9062-01-0023, Alaron-040, Alaron-051, Alaron-052, Alaron-053, Alaron-288, and Alaron-419 to verify the materials were documented and shipped in accordance with the applicable NRC and DOT requirements.

#### **1.2 Observations and Findings**

The licensee continues to make progress towards completion of decontamination and decommissioning activities. The inspector toured the facility to review the licensee's progress, specifically, the reactor building, hot lab, and soil lay down area. The inspector noted the required radiological postings were readily visible and areas were generally clean and free of personnel hazards. The hot work being performed in the reactor building included a fire watch, in which a fire extinguisher was readily available and no combustibles were present in the surrounding area.



The inspector's review of the corrective action reports described above determined that the licensee was identifying issues and appropriately evaluating and correcting them. All actions were found to be corrected in a timely fashion commensurate with their safety significance in order to prevent recurrence.

The inspector's review of the transportation of radioactive waste process and procedure determined the licensee had trained and knowledgeable individuals performing waste shipment activities. The licensee was performing these activities in accordance with their approved procedures that are consistent with the applicable NRC and DOT requirements. During the inspection, the inspector was made aware of an issue identified by the low level radioactive waste disposal site, operated by EnergySolutions in Clive, Utah, that the licensee has been shipping radioactive waste for land disposal. This issue was discovered when EnergySolutions performed a reevaluation of a number of radioactive waste shipments received after an error was discovered in their computer software used to verify burial classification of radioactive waste packages. On October 20, 2010, the licensee was informed by EnergySolutions that package 1906-OJ-099 in shipment manifest number 9062-03-0001, which was shipped on March 5, 2008, had exceeded the limits for disposal as Class A waste. In addition, EnergySolutions notified the Utah Division of Radiation Control of this issue on December 13, 2010. The licensee notified the inspector during this inspection that on January 20, 2011, the State of Utah issued two violations regarding this misclassification issue. The inspector evaluated the licensee's actions surrounding this issue.

The licensee performed a reevaluation of the package discovered by EnergySolutions to be above the limit for Class A waste. They confirmed it was above the limit for Class A waste according to the information on the documented shipment manifest and had been misclassified. Specifically, the activity concentration of Strontium-90 calculated in the waste package when combined with the other radionuclide concentrations present should have caused the licensee to classify it as Class B according to Title 10 of the Code of Federal Regulations (CFR) 61.55. The licensee also determined during the reevaluation of the package that they used conservative values to calculate the activity concentrations of the radionuclides present. The licensee recalculated the activity concentrations of the radionuclides in the package that was misclassified and determined it did meet the Class A waste concentration limits in 10 CFR 61.55. The inspector concluded that the misclassification did not result in a significant failure to identify the type, quantity, or form of the material and consequently did not result in a lack of radiological control of the shipment.

Title 10 CFR Part 20.2006(b) requires that any licensee shipping radioactive waste intended for ultimate disposal at a licensed land disposal facility must document the information required on NRC's Uniform Low-Level Radioactive Waste Manifest (ULRWM) and transfer this recorded manifest information to the intended consignee in accordance with Appendix G to 10 CFR Part 20. Title 10 CFR Part 20 Appendix G requires, in part, the preparation of all wastes so that the waste is classified according to 10 CFR Part 61.55. The failure to classify the waste package according to 10 CFR Part 61.55 is a violation of 10 CFR Appendix G, Section III.A.1. The licensee implemented corrective actions to prevent recurrence as a result of the discovery of this issue by EnergySolutions. These actions include communication to the licensee's staff involved in transportation activities, using the industry standard RADMAN computer software to perform shipping related calculations and manifests, performing independent

calculations for 95% of all shipments which include 100% of the packages in that consignment, and all calculations now use accurate dose rates rather than conservative values. It should be noted that the use of the RADMAN software was implemented by the licensee in 2009 before this issue was discovered. These corrective actions were entered into their corrective action program on January 26, 2011 as PN 411. (VIO 05000030/2011-01-01; VIO 05000185/2011-01-01)

In addition, the inspector review of additional waste shipment manifests from 2008 through 2011, described in the scope section did not identify of any errors and all shipments were conducted in accordance with the applicable NRC and DOT requirements.

### 1.3 Conclusions

Inspector observations of the facility determined that work areas were adequately established to ensure worker safety and that the control of radioactive material areas and wastes were roped off and labeled appropriately.

The inspector determined that the licensee was adequately capturing issues in its corrective action program and the scope and timeliness of corrective actions were commensurate with their safety significance.

The licensee misclassified a waste container in 2008, which resulted in a violation of regulatory requirements. Since that time, the licensee has implemented changes to their program and corrective actions to prevent recurrence. Currently, the licensee's process to ship radioactive waste is being conducted in accordance with an approved procedure, which is consistent with the applicable NRC and DOT regulations and requirements. A review of subsequent shipments did not identify any errors and all shipments met the applicable regulatory requirements.

## 2.0 **Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors (83801)**

### 2.1 Inspection Scope

The inspector evaluated the licensee's survey process for the soils being evaluated at the soil lift station with respect to the surveys performed during excavation and the final status surveys. The inspector toured the soil lift station area and reviewed Radiation Work Permit (RWP) Numbers PB-10-005, Revision 1, and PB-11-005, Revision 0, which describe the survey requirements for those soils being excavated. To determine the results of surveys being performed under the above RWPs, the inspector reviewed Radiation Protection Survey Forms for areas of the site designated as Phase 6, dated 1/6/11, and Lateral C, dated 12/22/10, 12/23/10, 1/3/11, 1/4/11, 1/5/11, 1/10/11, 1/11/11, and 1/13/11. In addition, the inspector reviewed a sample of final status survey release records for the soil lift station to determine if the surveys were being performed in accordance with the applicable survey request requirements and final status survey plan. Survey Request (SR)-283, dated 10/7/10 and SR-290, dated 11/4/10, were reviewed to determine the final status survey requirements. The inspector then reviewed final status survey release records OL-5-2, Revision 0; OL-5-4, Revision 0;

OL-5-6, Revision 0; OL-5-8, Revision 0; OL-5-10, Revision 0; OL-5-12, Revision 0; OL-5-14, Revision 0; OL-5-16, Revision 0; OL-5-18, Revision 0; and OL-5-20, Revision 0.

The inspector also performed in-process confirmatory final status surveys in the Hot Laboratory building. The inspector performed these surveys in select areas in Hot Laboratory Hot Cell 1 and Hot Laboratory - Room 17 (Hot Handling Room [HHR]) ceiling and crane. The inspector reviewed SR-297, dated 12/21/10 for the HHR ceiling and crane, SR-299, dated 1/3/11 for Hot Cell 1 Floors, and SR-300, dated 1/3/11 for Hot Cells 1 and 2 Walls, to determine the survey requirements for these areas. The inspector's survey results were then compared to the licensee's results documented in the SR-299 Survey Request Close-Out Summary, dated 2/1/11, and identified through interviews with licensee radiation protection technicians in the field.

## 2.2 Observations and Findings

The inspector determined through a review of the licensee's process for excavating soils for eventual final status survey in the soil lift station that the licensee was taking appropriate measures to minimize the potential for blending of more contaminated and less contaminated soils. The licensee used an appropriate action level to separate those soils known to be above the DCGL for surface soils during the excavation activities through job coverage surveys. Those soils were added to those materials being sent to a licensed low level radioactive waste disposal facility. Through the review of final status survey release record data for the soil lift station referenced above, the inspector verified that the surveys were performed in accordance with the requirements in the applicable survey request and licensee's final status survey plan. Any areas above the investigative level were remediated as necessary and all final results for the survey units reviewed were below the approved DCGLs.

The licensee is currently performing final status surveys in the Hot Laboratory building. The inspector performed in-process confirmatory surveys in survey units HL-1-72 for Hot Laboratory Hot Cell 1 walls, HL-1-70 for Hot Cell 1 Floors and HL-1-47 for HHR ceiling and crane. The licensee determined each of these survey units to be Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Class 1 and a 100% scan of the surfaces was conducted by the licensee, along with systematic static measurements with a 100 square centimeter beta scintillator. The inspector also performed the surveys of selected portions of these survey units with a 100 square centimeter beta scintillator. All results were consistent with the licensee's. In addition, the inspector performed selected independent confirmatory static measurements of selected licensee investigative locations in HL-1-72 and HL-1-70. The inspector compared the results to the licensee's in the field and documented in SR-299 and they were consistent and well below the DCGL stated in the licensee's final status survey plan.

## 2.3 Conclusions

The licensee was adequately performing soil excavation and survey activities to minimize the potential for blending. The final status surveys performed for the soil lift station excavated soils were in accordance with the applicable survey request and final status survey plan requirements.

The inspector's independent in-process confirmatory survey results for the areas surveyed in the Hot Laboratory building were consistent with the licensee's, and below the approved DCGLs. The inspector concluded that the final status surveys being performed were consistent with the requirements of the applicable survey requests and licensee's final status survey plan.

### **3.0 Exit Meeting Summary**

The inspector presented the interim inspection results to licensee management at the conclusion of the onsite inspection on January 27, 2011. After in-office review was completed on February 10, 2011, a final exit teleconference was held on February 10, 2011. The licensee acknowledged the results presented.

ATTACHMENT: SUPPLEMENTAL INFORMATION

**SUPPLEMENTAL INFORMATION**  
**PARTIAL LIST OF PERSONS CONTACTED**

Licensee

<sup>1,2</sup>K. Peecook, Program Manager  
<sup>1,2</sup>W. Stoner, Radiation Safety Officer  
<sup>1,2</sup>R. Case, Assistant Program Manager  
<sup>1,2</sup>P. Kolb, Senior Project Engineer  
<sup>1,2</sup>J. Thomas, Project QA & Licensing Manager

<sup>1</sup>Indicates presence at the interim exit meeting held on January 27, 2011.  
<sup>2</sup>Indicates presence on the final exit teleconference held on February 10, 2011.

**LIST OF PROCEDURES USED**

IP 69013      Research and Test Reactor Decommissioning  
IP 83801      Inspection of Remedial and Final Surveys at Permanently Shutdown Reactors

**ITEMS OPENED, CLOSED, AND DISCUSSED**

Opened and Closed	Type	Summary
VIO 05000030/2011-01-01 VIO 05000185/2011-01-01	VIO	Failed to classify waste according to 10 CFR 61.55, which is required by 10 CFR 20 Appendix G, Section III.A.1
Discussed	None	

**LIST OF ACRONYMS USED**

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
DCGL	Derived Concentration Guideline Level
DNMS	Division of Nuclear Material Safety
DOT	Department of Transportation
HHR	Hot Handling Room
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
NASA	National Aeronautical and Space Administration
NRC	U. S. Nuclear Regulatory Commission
PN	Problem Number
RP	Radiation Protection
RWP	Radiation Work Permit
SR	Survey Request
ULRWM	Uniform Low-Level Radioactive Waste Manifest

## **DOCUMENTS REVIEWED**

Licensee documents used during the inspection were specifically identified in the Report Details above.