

RULEMAKING ISSUE AFFIRMATION

December 8, 2011

SECY-11-0170

FOR: The Commissioners

FROM: R. W. Borchardt
Executive Director for Operations

SUBJECT: FINAL RULE: PHYSICAL PROTECTION OF BYPRODUCT
MATERIAL (RIN 3150-AI12)

PURPOSE:

To request Commission approval to publish a final rule in the *Federal Register* that adds a new Part 37 to Title 10 of the *Code of Federal Regulations* (10 CFR) and make conforming changes to Parts 20, 30, 32, 33, 34, 35, 36, 39, 51, 71, and 73. The final rule amends the regulations to establish security requirements for the use of category 1 and category 2 quantities of radioactive material and for the transportation of small quantities of irradiated fuel.

SUMMARY:

The U.S. Nuclear Regulatory Commission (NRC) staff is recommending that the Commission approve a final rule that applies security requirements to byproduct material, specifically to category 1 and category 2 quantities of radioactive material. The new security requirements will be codified in a new 10 CFR Part 37. The rule will also include new security requirements for the transportation of 100 grams or less of irradiated reactor fuel. In developing the final rule the NRC staff considered, among other things, the various security orders issued by the NRC, lessons-learned during implementation of the security orders, the recommendations of the Independent Review Panel and the Materials Working Group, and public comments on the proposed rule. The rule also considers a petition for rulemaking (PRM-71-13) submitted by the State of Washington that requested that the NRC adopt the use of global positioning satellite tracking as a national requirement for vehicles transporting highly radioactive mobile or portable radioactive devices. The final rule addresses access authorization, physical protection during use, and physical protection of byproduct material during transportation.

CONTACT: Merri Horn, FSME/DILR
301-415-8126

BACKGROUND:

The Commission approved publication of the proposed rule in a Staff Requirements Memorandum (SRM) dated May 13, 2010 (NRC's Agencywide Documents Access and Management System (ADAMS) ML101330181). On June 15, 2010, the NRC published the proposed rule for a 120-day public comment period (75 FR 33902; June 15, 2010). After receiving several requests to extend the public comment period, the NRC extended the comment period to January 18, 2011 (75 FR 62330; October 8, 2010). The NRC received 110 comment letters on the proposed rule. Among the commenters on the proposed rule were licensees, Agreement States, industry organizations, individuals, and a Federal agency. The comments and associated responses are discussed in Section III of the *Federal Register* notice containing the final rule (Enclosure 1).

DISCUSSION:

The NRC staff is proposing that the Commission approve the final rule to promulgate new security requirements for use and transportation of category 1 and category 2 quantities of radioactive material. The new part consists of seven subparts. Subpart A contains the general provisions such as the purpose and scope of the regulation, definitions, exemptions, and information collection requirements. Subpart B contains the requirements for the background investigation and access authorization program. Subpart C contains the security requirements for use of the radioactive material. Subpart D contains the transportation security requirements. Subpart E is reserved for future provisions. Subpart F contains the records and reporting requirements, and Subpart G contains the enforcement provisions. Conforming changes are made in other parts of the regulations, as appropriate. The key aspects of Subparts A, B, C, and D are discussed in the following paragraphs and in more detail in the *Federal Register* notice. Rule provisions are discussed in detail in Section II of the *Federal Register* notice.

Subpart A

As noted above Subpart A contains the general provisions. One of the general provisions covers exemptions to Part 37 provisions. In response to the public comments received, the rule working group added an exemption to Subpart A that covers certain decommissioning and other wastes. Facilities that possess radioactive waste that in the aggregate equals or exceeds the category 2 threshold are exempt from most of the provisions of Part 37. The following provisions apply to secure such waste material: use of continuous barriers, use of a locked door or gate with monitored alarm, assessment and response to actual or attempted unauthorized access, and notification of the local law enforcement agency (LLEA) and a request for an armed response. The exemption does not apply if the waste contains discrete category 1 or category 2 sources, ion-exchange resins, or activated material that weighs less than 2,000 kilograms (4,409 pounds).

Subpart B

Subpart B contains the provisions for the background investigation and access authorization program. The requirements are applied to any licensee that allows unescorted access to an aggregated category 1 or category 2 quantity of radioactive material. The key components of the access authorization program include the use of a reviewing official, informed consent,

personal history disclosure, background investigations, use of implementing procedures, the right to correct and complete information before an adverse determination, and an annual program review. A limited reinvestigation would be required every 10 years.

In response to the public comments received, the rule working group made a number of changes to Subpart B. The requirements in the proposed rule were based, in part, on the total amount of material possessed by the licensee. The subpart provisions in the final rule only apply if the licensee allows unescorted access to an aggregated category 1 or category 2 quantity of radioactive material. Additionally, licensees are not required to submit compliance information. One of the other changes is the approval of the reviewing official. The NRC and Agreement States will not be approving the reviewing official. The licensee will be required to submit the name of the reviewing official and state under oath and affirmation that the licensee has determined the individual to be trustworthy and reliable. The licensee's determination will be based on a complete background investigation that includes fingerprinting and a Federal Bureau of Investigation (FBI) criminal history records check. In order to require fingerprinting, the rule requires that the reviewing official be permitted unescorted access to radioactive material or safeguards information (SGI). Specific language was also added to clarify that the background investigation relief categories set forth in Part 37 apply to the reviewing official.

The rule working group revised the requirement for procedures needed to implement the access authorization program to make the requirement more general, which provides the licensee with greater flexibility to develop the procedures that it needs for its program.

The rule working group also revised the categories of individuals provided relief from the fingerprinting and background investigation requirements. A new category that covers package handlers at transportation facilities was added. Licensees would have no way of controlling access at a transportation facility. Individuals that fall under the category of individuals who have had a favorably adjudicated U.S. Government criminal history records check under a comparable U.S. Government program are now only granted relief from the fingerprinting and FBI criminal history records check portion of the background investigation and not the entire background investigation. This is the approach that was used in the security orders.

The elements of the background investigation have changed substantially from the proposed rule; the local criminal history check and the credit history evaluation are no longer included. In addition, the military history has been combined with the employment history. Although there is some benefit to including the local criminal history check and the credit history evaluation, in the end the NRC staff determined that neither item provided enough benefit to be required.

Although both the rule working group and steering committee were split over the inclusion of the credit history, the NRC staff recommendation is to not require the credit history as an element in the background investigation. The credit history can provide information that is useful in making a determination that an individual is trustworthy and reliable. Credit history can add an extra layer of defense in mitigating the insider threat and can provide some information that is not easily available from other sources. Credit history was never intended to be the sole determining factor for trustworthiness and reliability; rather, credit history is just additional information to be considered in the trustworthiness and reliability determination. However, as many of the commenters pointed out, there are issues with the accuracy of credit reports, and a poor credit history is not necessarily an indicator that an individual is not trustworthy or reliable,

particularly in these tough economic times. Several States indicated that some Agreement States might not be able to implement the provision due to State laws. However, the Office of the General Counsel (OGC) advised the NRC staff that most State laws contain an exemption if the credit history was required by Federal law or regulation. These aspects could result in uneven implementation of the provision across the country. As pointed out by the commenters, it is harder and more expensive to obtain a credit history for those who have resided in other countries for long periods of time. This could lead to an imbalance in the information collected and used in making the trustworthiness and reliability determination. In addition, some licensees may decide not to grant unescorted access to fully qualified individuals because of the lack of information or the difficulty in obtaining the information. Many smaller licensees may not have staff or capability to fully utilize the information obtained from the credit history in determining trustworthiness and reliability.

After weighing both sides of the argument, the NRC staff determined that the potential benefit of the credit history is not justified, and therefore, the NRC staff has not included credit history check as a required element of the background investigation. The NRC staff notes that information obtained from the credit history check could be useful to licensees, and nothing in the NRC regulations prohibits a licensee from conducting a credit history check. In situations where it is difficult to make a trustworthiness and reliability determination based on required information alone, the information from a credit history check could provide the determining information. A licensee can always use measures beyond the regulatory minimum that is required by the access authorization program.

Subpart C

Subpart C contains the provisions for physical protection during use of category 1 and category 2 quantities of radioactive material. In general, Subpart C requires licensees possessing an aggregated category 1 or category 2 quantity of radioactive material to develop and implement a security program.

The objective of the security program is to monitor and, without delay, detect, assess, and respond to any actual or attempted unauthorized access to category 1 or category 2 quantities of radioactive materials. A licensee's security program needs to include a written security plan, implementing procedures, training, use of security zones, coordination with the LLEA, testing and maintenance of security-related equipment, security measures, and a program review.

The subpart also establishes special requirements for enhanced security measures for mobile sources and when tamper-indicating and alarm systems must be disabled to permit the maintenance of equipment or replacement of radioactive materials.

In response to the public comments received, the rule working group made a number of changes to Subpart C. The subpart provisions in the final rule only apply if the licensee possesses an aggregated category 1 or category 2 quantity of radioactive material. The proposed rule contained some provisions that were based on the material that was authorized on the license and not on what the licensee actually possessed. Additionally, licensees are not required to submit compliance information under the final rule. One of the major changes is the removal of the notification to the LLEA for work at temporary jobsites. The rule working group determined that the difficulty in implementing the provision outweighed any potential benefit of

this notification requirement. The rule working group also removed several of the LLEA coordination elements, including the requirement to request a written agreement and request notification of any degradation in LLEA response capabilities. The steering committee was split on the inclusion of the minimum LLEA coordination items. The minimum information to be shared with the LLEA is a description of the facilities and material along with a description of the security measures being employed by the licensee and a notification that the licensee will request a timely armed response to any theft, sabotage, or diversion of material.

The rule working group also revised the requirement for testing and maintenance of the security-related equipment. The testing frequency is now the manufacturer's recommended frequency. If the manufacturer does not provide a suggested frequency, the testing and maintenance are to be conducted annually. The requirement for calibration of the equipment was removed.

For portable and mobile devices, the rule working group included relief in the rule when there may be health and safety considerations if the vehicle with the device is disabled. If a site has health and safety requirements that prevent disabling of vehicles, the licensee does not need to meet the provision requiring disabling of the vehicle.

In the SRM on the proposed rule, the Commission directed the NRC staff to highlight the overall reporting requirements as one area for which public comments were specifically requested. The Commission also directed the NRC staff to consider whether observation of suspicious activities should be included in the reporting requirements. The NRC staff did request specific input on the reporting requirement, including reporting of suspicious activities. The input received from commenters and the NRC responses are addressed in comment and response A37 of Section III of the *Federal Register* notice. Based on the comments, the working group did make some changes to clarify the requirements and provide the licensee greater flexibility. The final rule contains a requirement to report suspicious activities.

Subpart D

Subpart D contains the security provisions for the transport of category 1 and category 2 quantities of radioactive material and for shipments of 100 grams or less of irradiated reactor fuel. The requirements are applied in a graded approach with more measures placed on transport of category 1 quantities of radioactive material and the irradiated reactor fuel than on amounts that pose lower risks. The measures require pretransfer checks, preplanning and coordination activities, advance notice for category 1 shipments, reporting in the event of a lost or missing shipment or suspicious activities related to the theft or diversion of the shipment, and control, monitoring, and communications during shipments.

For road shipments of category 1 quantities of radioactive material, licensees are required to use a carrier that has established movement control centers that maintain periodic position information, use a telemetric position monitoring system, and establish redundant communications that allow the transport to contact the movement control center. The requirements for the small quantities of irradiated reactor fuel are the same as those for category 1 quantities of radioactive material.

For shipments of category 2 quantities of radioactive material, licensees are required to maintain constant control or surveillance during transit and have the capability for immediate communication to summon appropriate response or assistance. If a licensee uses a carrier for transport of the material, the licensee must make sure that the carrier meets the requirements and the carrier must have an established package tracking system.

In response to the public comments received, the rule working group made a number of changes to Subpart D. The requirement for verification of the license before transfer of material has been revised to include an emergency option that can be used when the license verification system is nonfunctional and the licensee cannot reach the regulator (NRC or an Agreement State). The requirement has also been revised to exempt a licensee if the transfer is within the same organization such as a company that has a license in several States. The rule no longer requires documentation of the verification, if the license verification system is used.

The provision for the no-later-than arrival time for category 2 shipments is retained in the final rule. However, the rule working group did remove this provision for category 1 shipments. Because the licensee maintains routine contact with the driver and would initiate an investigation if the driver failed to check in at the set times, the no-later-than arrival time was not necessary to trigger an investigation for Category 1 shipments.

Based on public comments, the rule working group revised the preplanning and coordination requirements to remove some of the specificity in the required coordination with the States. Licensees are required to discuss the State's intention to provide law enforcement escorts and identify safe havens; other elements have been removed from the rule because they are not necessary and are overly prescriptive.

Petition for Rulemaking (PRM-71-13)

On July 16, 2008, the NRC published the resolution and closure of a petition for rulemaking filed by Christine O. Gregoire, Governor of the State of Washington (PRM-71-13) (73 FR 40767; July 16, 2008). The petitioner requested that the NRC adopt the use of global positioning system (GPS) tracking as a national requirement for vehicles transporting highly radioactive mobile or portable radioactive devices. As an alternative, the petitioner stated that the Commission could grant States the flexibility to impose more stringent requirements than those required under the current increased controls. The final rule contains a requirement to use a telemetric position monitoring system or an alternative tracking system when transporting category 1 quantities of radioactive material. Use of GPS would be one method to satisfy the requirement. For licensees transporting category 2 quantities of radioactive material, tracking would not be required in the draft final rule. The licensee is required to maintain constant control or surveillance during transit. In addition, the rule at § 37.53 imposes additional security measures on mobile devices that includes using a method to disable the vehicle or trailer when not under direct control and constant surveillance by the licensee. The NRC believes that these requirements provide adequate protection for mobile devices and that GPS tracking is neither justified nor necessary. The majority of the transportation security requirements are Compatibility Category B because there are direct and significant transboundary implications.

Authority Basis

The NRC issued some of the security orders under the NRC's authority to protect the common defense and security. These included the security orders to certain panoramic and underwater irradiator licensees, manufacturer and distributor licensees, and certain licensees that might be expected to transport category 1 quantities of radioactive materials. The security orders were issued to NRC and Agreement State licensees. The remaining security orders were issued under the NRC's authority to protect the public health and safety and were issued to NRC licensees. To effect nationwide implementation, each Agreement State issued requirements to put identical measures in place for licensees under their regulatory jurisdiction. The NRC staff is proposing to issue these regulations under its public health and safety authority, and these regulations will be applicable to Agreement State licensees through the Agreement State program.

Implementation

The NRC staff is recommending that the final rule be effective 1 year after publication in the *Federal Register*. This would provide sufficient time for licensees to implement the necessary programs, develop procedures, and conduct training on the new requirements. The Agreement States would be required to issue compatible regulations within 3 years of publication of the final rule instead of 3 years from the effective date. The provisions established for the inspection of licensees in Agreement States that received the security orders issued under common defense and security will remain in place until the Agreement State implements the regulations. For those States that entered into 274i Agreements, the State will continue inspections under the Agreement. For those States that did not enter into 274i Agreements, NRC will continue to conduct the inspections until the State has implemented the new requirements. The NRC will rescind the security orders once the requirements have become effective.

The implementation plan outlining the NRC staff's plan to rescind the security orders is in Enclosure 2. The NRC staff will rescind the security orders issued to NRC licensees on the effective date of the final rule. The NRC staff will rescind the security orders issued to Agreement State licensees once the rule or other legally binding requirements are effective in each State. A crosswalk between the rule and the security orders is included as an attachment to the implementation plan. The crosswalk notes the differences between the rule and security orders. The intent of the security order requirements is captured in the draft final rule. However, the requirements are not captured verbatim. Some of the rule requirements may not be as stringent as the order requirements. However, the NRC staff believes that the security orders issued related to category 1 and category 2 quantities of radioactive material should be completely rescinded upon the rule becoming effective. It is possible that the license verification system may not be fully functional by the effective date of the rule. If the system is not fully functional, the security orders issued to manufacturers and distributors and licensees that transport category 1 quantities of radioactive material will not be completely rescinded. The order requirement on verification of license will remain in place until the license verification system is fully operational. Once the system is fully operational, the orders will be completely rescinded.

The security information for panoramic irradiator licensees, manufacturer and distributor licensees (M&Ds), and any licensee shipping category 1 quantities of radioactive material are

still categorized as safeguards information-modified handling (SGI-M) under Part 73. This means that the NRC would continue to be responsible for the inspection of the information protection requirements for SGI-M at these facilities. In SECY-09-0181 (ADAMS ML092820195), the NRC staff committed to provide a proposal for a rulemaking to revise the SGI-M requirements. Enclosure 3 contains the Part 37 rule working group's proposal. As discussed in Enclosure 3, the Part 37 rule working group recommends that the Commission approve initiating a rulemaking that would result in the Commission revising its determination that the security related information for panoramic irradiators, M&Ds, and transport of category 1 quantities of radioactive material is SGI-M. The suggested rulemaking would revise the categories of licensees subject to the provisions of 10 CFR Part 73 for the protection of SGI-M. The NRC staff endorses the recommendation of the rule working group. The NRC staff believes that this approach achieves sufficient protection of sensitive information while facilitating effective implementation of the Part 37 requirements.

The NRC staff plans to issue the implementation guidance within 30 days after the final rule is published. This will provide enough time for licensees to use the guidance as they make revisions to their programs in accordance with the final rule. The draft guidance document was noticed for public comment on July 14, 2010 (75 FR 40756), with the comment period originally ending on November 12, 2010. The comment period was extended to January 18, 2011. In addition, the NRC held two public meetings on the guidance document during the comment period. The first meeting was held in Austin, Texas on September 1, 2010, and the second meeting was held at the NRC auditorium on September 20, 2010. The comment period for the guidance ended on January 18, 2011.

No change to the enforcement policy should be necessary for implementation of Part 37. However, inspection procedures will be updated. The training program for inspectors will be updated to reflect the new requirements. In addition, Agreement State staff will need to be trained on those security aspects that will now be conducted under Agreement State authority.

Strategic Goals and Objectives

The final rule is consistent with NRC strategic objectives and performance goals. The rule will continue to ensure the protection of public health and safety and the promotion of common defense and security. The rule will improve the security of category 1 and category 2 quantities of radioactive material and continue to ensure the secure use and management of radioactive materials. The rulemaking was conducted in an open process that allowed the public and other stakeholders to comment on the proposed rule and associated draft guidance.

AGREEMENT STATE ISSUES:

The Agreement States were represented on the rule working group and the steering committee associated with this rulemaking. A copy of the draft final rule *Federal Register* Notice was provided to the Agreement States so they could have an early opportunity for review.

Two Agreement States (Colorado and Washington), the Organization of Agreement States (OAS), and the Conference of Radiation Control Program Directors (CRCPD) provided comments on the draft *Federal Register* notice. Washington believes that GPS should be required to assist with the recovery of stolen and missing vehicles carrying category 2 quantities

of radioactive material. The NRC staff believes that if the licensee is implementing the provisions in the rule that GPS on the vehicle is not necessary. Therefore, the rule was not changed in response to the comment. Overall, OAS was supportive of the changes that were made to the final rule in response to stakeholder comments. OAS did express concern over the requirement that the reviewing official be granted unescorted access to the radioactive material and requested that § 37.23(b)(3) be removed from the rule. CRCPD also disagrees with the requirement that the reviewing official must be granted unescorted access to the radioactive material. The NRC staff continues to believe that the reviewing official must be fingerprinted and undergo an FBI criminal history records check to help ensure that the individual who is determining trustworthiness and reliability is himself or herself trustworthy and reliable. However, the compatibility of § 37.23(b)(3) was changed to Category C to allow States to be more restrictive as it relates to access to the material. Some States may have authority to require fingerprinting by use of other mechanisms than the Atomic Energy Act. The CRCPD believes that much of the final rule seems unnecessary and burdensome and may not be justified and objects to what they call the “one size fits all” approach. The only area that CRCPD addressed is the LLEA coordination; however, CRCPD did not specify any particular aspect of the LLEA coordination. CRCPD believes that the LLEA coordination is problematic and difficult for enforcement and that the requirements should be placed in the guidance. The NRC staff believes that coordination with LLEA is an important aspect of the security program and needs to remain in place. As noted above the coordination activities have been revised in the final rule to remove many of the specific coordination elements and the requirements have actually been relaxed from the orders. The final rule contains the minimum coordination that the NRC staff finds necessary and acceptable to ensure security of radioactive material. Therefore, the NRC staff has not made any changes to the final rule. Other comments were editorial or questions.

The NRC staff has analyzed the final rule in accordance with the procedures established within Part III of the Handbook to Management Directive 5.9, “Categorization Process for NRC Program Elements.” The final rule has different compatibility designations depending on the specific section of the rule. The compatibility determination for the final rule is addressed in Section VI of the final rule Statements of Consideration on Agreement State Compatibility.

The Standing Committee on Compatibility reviewed the final rule and agreed that these amendments to the NRC regulations are a matter of compatibility between the NRC and the Agreement States. The Committee and the NRC staff have reached agreement on the compatibility designations that are reflected in the draft final rule.

COMMITMENTS:

The NRC staff will issue a guidance document within 30 days of the final rule being published.

RECOMMENDATIONS:

That the Commission:

1. Approve for publication in the *Federal Register* the notice of final rulemaking (Enclosure 1).

2. Certify that this rule, if promulgated, will not have significant impact on a substantial number of small entities to satisfy the requirement of the Regulatory Flexibility Act, 5 U.S.C. 605(b). This certification is included in the enclosed *Federal Register* notice.
3. Approve rescinding the security orders on the effective date of the final rule in accordance with the implementation plan (Enclosure 2).
4. Approve the NRC staff's recommendation to conduct a rulemaking to remove the SGI-M requirement for certain licensees (Enclosure 3).
5. Note:
 - a. That the Chief Counsel for Advocacy of the Small Business Administration will be informed of the certification and the reasons for it, as required by the Regulatory Flexibility Act, 5 U.S.C. 605(b);
 - b. A final Regulatory Analysis has been prepared for this rulemaking (Enclosure 4);
 - c. An Environmental Assessment has been prepared for this rulemaking (Enclosure 5);
 - d. The Office of Management and Budget (OMB) has determined that this action is a "major rule" as defined in the Congressional Review Act of 1996 [5 U.S.C 804(2)]. The appropriate Congressional and Government Accountability Office contacts will be informed;
 - e. The appropriate Congressional committees will be informed;
 - f. A press release will be issued by the Office of Public Affairs when the final rulemaking is filed with the Office of the Federal Register; and
 - g. The final rule contains amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501, et seq.) that must be submitted to the OMB for its review and approval before publication of the final rule in the *Federal Register*.

RESOURCES:

The estimated resources to complete the rule and implementation guidance and to update the inspection procedures are included in the fiscal year (FY) 2012 President's Budget [2 full-time equivalents (FTE) across all offices in FY12 (1.9 for the Office of Federal and State Materials and Environmental Management Programs (FSME) and 0.1 for the Office of Nuclear Security and Incident Response (NSIR))].

Staff estimates that about 0.5 FTE (0.1 FTE each for the Offices of the General Counsel, Administration, and NSIR, and 0.2 FTE for FSME) would be necessary to conduct the safeguard information rulemaking discussed in Enclosure 3, if approved by the Commission. If approved, these resources will be sought through the FY 2013 Planning, Budgeting, and Performance

Management process. Resources to conduct the training for the Agreement State personnel will be addressed in the FY 2014 and FY 2015 budgets.

COORDINATION:

The Office of the General Counsel has no legal objection to the rulemaking. The Office of the Chief Financial Officer has reviewed this Commission Paper for resource implications and has no objections.

/RA by Michael F. Weber for/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. *Federal Register* Notice
2. Implementation Plan
3. SGI-M Rulemaking Proposal
4. Regulatory Analysis
5. Environmental Assessment

Management process. Resources to conduct the training for the Agreement State personnel will be addressed in the FY 2014 and FY 2015 budgets.

COORDINATION:

The Office of the General Counsel has no legal objection to the rulemaking. The Office of the Chief Financial Officer has reviewed this Commission Paper for resource implications and has no objections.

/RA by Michael F. Weber for/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. *Federal Register* Notice
2. Implementation Plan
3. SGI-M Rulemaking Proposal
4. Regulatory Analysis
5. Environmental Assessment

ML112920070 **WITS 200600397/EDATS: SECY-2011-0613**
WITS 200700185/EDATS: SECY-2011-0611
WITS 200700264/EDATS: SECY-2011-0610

OFC	PM:RBB/DILR	BC:RBB/DILR	D:DILR	D:MSSA
NAME	MHorn	KO'Sullivan	JPiccone	JLuehman
DATE	10 / 26 /11	11/3/11	11/8/11	10/6/11
OFC	OCFO	NRR	OIS	OGC
NAME	JDyer (MKidwell for)	ELeeds (SHelton for)	RNichols (TDonnell for)	MYoung NLO (by NStAmour)
DATE	10/17/11	9/28/11	10/18/11	11/ 29 /11
OFC	OE	ADM	NSIR	Tech Editor
NAME	RZimmerman (NHilton for)	CBladey	JWiggins	PTressler (CPoland for)
DATE	10/3/11	9/30/11	9/22/11	11/30/11
OFC	FSME	EDO		
NAME	MSatorius	RWBorchardt (MWeber for)		
DATE	11/30/11	12/08 /11		

OFFICIAL RECORD COPY