



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

June 14, 2022

EA-21-129

Ms. Sharon Busby, President
Advanced Inspection Technologies, Inc.
3820 Charles Page Blvd.
Tulsa, OK 74127

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL
PENALTY - \$8,000 AND EXERCISE OF ENFORCEMENT DISCRETION,
NRC INSPECTION REPORT 150-00035/2020-002 AND INVESTIGATION
REPORT 4-2021-005

Dear Ms. Busby:

This letter refers to the investigation completed on August 30, 2021, by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations at Advanced Inspection Technologies, Inc., (AIT or licensee) in Tulsa, Oklahoma. The investigation was conducted to determine whether licensee employees willfully conducted licensed activities in NRC jurisdiction without filing for reciprocity. The NRC's investigation results were discussed with you during a telephone conversation on February 2, 2022. A factual summary of the investigation was issued as an enclosure to our letter dated February 15, 2022, Agencywide Documents Access and Management System (ADAMS) Accession No. ML22040A362.

In the February 15, 2022, letter transmitting the inspection report, we informed you that two apparent violations were being considered for escalated enforcement action. In the letter, we provided you the opportunity to address the apparent violations identified in the report by either attending a predecisional enforcement conference, engaging the NRC in alternative dispute resolution mediation, or by providing a written response before we made our final enforcement decision. In a letter dated March 8, 2022, ADAMS Accession No. ML22112A253, you provided your response to the apparent violations.

Based on the information developed during the investigation, the in-office review by the inspection staff, and the information that you provided in your written response to the inspection report, the NRC has determined that two violations of NRC requirements occurred. These violations are cited in Enclosure 1, "Notice of Violation and Proposed Imposition of Civil Penalty" (Notice), and the circumstances surrounding them are described in detail in the subject inspection report. The violations involved the failure to: (A) file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of your Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office at least 3 days before engaging in activity in a Non-Agreement State; and (B) ensure that information provided to the Commission by a licensee is complete and accurate in all material respects.

The NRC considers Violation A to be a significant violation because your deliberate failure to file a submittal containing an NRC Form 241 and conduct of licensed activities in a Non-Agreement State prevents the NRC from inspecting these areas to ensure that licensed material is being used safely and in accordance with NRC requirements. Therefore, Violation A has been categorized in accordance with the NRC Enforcement Policy at Severity Level III. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

The NRC considers Violation B to be of low safety significance and thus has categorized it in accordance with the NRC Enforcement Policy as a Severity Level IV violation. This violation is being formally cited as Severity Level IV rather than as a non-cited violation because it was identified by the NRC.

In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$16,000 is considered for Severity Level III Violation A.

Because your facility is the subject of a willful escalated enforcement action, the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the NRC Enforcement Policy. The NRC has determined that *Identification* credit is not warranted because the NRC staff identified the violation. The NRC determined that *Corrective Action* credit is warranted based on your prompt corrective action to submit an NRC Form 241 after the NRC staff identified the non-compliance with the NRC regulation and your comprehensive corrective action to not perform licensed activities outside the state of Oklahoma as you committed to in your letter dated March 8, 2022. As a reminder, there are areas of exclusive Federal jurisdiction within the state of Oklahoma on military installations and tribal lands that would require submission of an NRC Form 241.

Normally for a willful Severity Level III violation, without credit for *Identification*, the NRC would assess a base civil penalty in the amount of \$16,000. However, NRC considered the information that you provided regarding AIT's financial hardship. Therefore, in consultation with the Director, Office of Enforcement, I have been authorized to exercise enforcement discretion, in accordance with Section 3.6 of the NRC Enforcement Policy, and issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of \$8,000 for Severity Level III Violation A.

You may choose to pay the proposed civil penalty by submitting your payment with the invoice enclosed to this letter (Enclosure 2), to the following address:

Office of the Chief Financial Officer
U.S. Nuclear Regulatory Commission
P.O. Box 979051
St. Louis, MO 63197

In addition, you may pay the proposed civil penalty in accordance with NUREG/BR-0254 "Payment Methods," Enclosure 3 or ADAMS Accession No. ML19163A244. When using NUREG/BR-0254 to pay the civil penalty, the bill number, EA-21-129, should be used as the "enforcement action identifier" when submitting your payment through one of the approved methods listed in the brochure. The NRC may consider a request for additional time to pay the proposed civil penalty, including the option to enter into an installment agreement, if payment of the civil penalty as a lump sum in the required timeframe would pose a financial hardship. To

request additional time to pay, you must submit a written request, with appropriate justification explaining your financial hardship, to NRCCollections.Resource@nrc.gov. All requests should be submitted in sufficient time to allow the NRC the ability to review your request for additional time to pay before the 30-day payment period expires.

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

The Institute on Conflict Resolution at Cornell University has agreed to facilitate the NRC's ADR program as a neutral third party. If you are interested in pursuing this issue through the ADR program, please contact: (1) the Institute on Conflict Resolution at 877-733-9415; and (2) Mr. Neil O'Keefe at 817-200-1156 within 10 days of the date of this letter. Your submitted signed agreement to mediate using the NRC ADR program will stay the 30-day period for payment of the civil penalties, as identified in the enclosed Notice, until the ADR process is completed.

The NRC has concluded that information regarding: (1) the reason for the violations; (2) the corrective steps that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in this letter and in your letter dated March 8, 2022. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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

If you have any questions concerning this matter, please contact Mr. Neil O'Keefe of my staff, at 817-200-1156.

Sincerely,



Signed by Morris, Scott
on 06/14/22

Scott A. Morris
Regional Administrator

Docket No. 150-00035
License No. General License
pursuant to 10 CFR 150.20

Enclosures:

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

cc w/ enclosures:

Michael Broderick
Environmental Program Manager II
Oklahoma Environmental Agency

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY - \$8,000 AND EXERCISE OF ENFORCEMENT DISCRETION, NRC INSPECTION REPORT 150-00035/2020-002 AND INVESTIGATION REPORT 4-2021-005 - DATED JUNE 14, 2022

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 DCylkowski, ORA

Document: [https://usnrc.sharepoint.com/teams/Region-IV-ACES/ACES S Drive/ENFORCEMENT/ EA CASES - OPEN/Advanced Inspection Technologies EA-21-129/Final Action/Licensee/NOVCP_EA-21-129_AIT.docx](https://usnrc.sharepoint.com/teams/Region-IV-ACES/ACES%20S%20Drive/ENFORCEMENT/_EA%20CASES%20-OPEN/Advanced%20Inspection%20Technologies%20EA-21-129/Final%20Action/Licensee/NOVCP_EA-21-129_AIT.docx)
 ADAMS ACCESSION NUMBER: ML22153A471

SUNSI Review By: JGK		ADAMS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive	Keyword:
OFFICE	ES:ACES	C:MLB	TL:ACES	RC	NMSS	OE
NAME	JKramer	NOKeefe	JGroom	DCylkowski	MBurgess	JPeralta
SIGNATURE	/RA/ E	/RA/ E	/RA/ E	/RA/ E	/RA/ E	/RA/ E
DATE	04/11/22	04/13/22	04/22/22	04/14/22	05/23/22	05/25/22
OFFICE	OGC	D:DNMS	RA			
NAME	RAugustus	MMuessle	SMorris			
SIGNATURE	/NLO/ E	/RA/ E	/RA/ E			
DATE	06/01/22	06/13/22	06/14/22			

OFFICIAL RECORD COPY

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Advanced Inspection Technologies, Inc.
Tulsa, Oklahoma

Docket No. 150-00035
License No. General License
EA-21-129

During an NRC investigation conducted from November 12, 2020, to August 30, 2021, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

I. Violation Assessed a Civil Penalty

- A. 10 CFR 150.20(a)(1) states, in part, that any person who holds a specific license from an Agreement State is granted a general license to conduct the same activity in Non-Agreement States subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in a Non-Agreement State shall, at least 3 days before engaging in each activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, between April 1 and October 12, 2020, Advanced Inspection Technologies, Inc., a licensee of the state of Oklahoma, engaged in licensed activities in a Non-Agreement State without filing a submittal containing an NRC Form 241, a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office at least 3 days before engaging in each activity. Specifically, Advanced Inspection Technologies Inc., performed radiography for 20 days (April 1; June 4; July 12, 14, 17, 23, 29; August 5, 12, 16, 20, 27; September 2, 9, 14, 16, 23; and October 1, 10, 12, 2020) in Joplin, Missouri, but did not request reciprocity until October 14, 2020. Since the work was performed in a Non-Agreement State beginning on April 1, 2020, Advanced Inspection Technologies, Inc., was required to provide this information to the NRC by March 29, 2020.

This is a Severity Level III violation (Enforcement Policy Section 6.9.c.2). Civil Penalty - \$8,000. EA-21-129

II. Violation Not Assessed a Civil Penalty

- B. 10 CFR 30.9(a) requires, in part, that information provided to the Commission by a licensee shall be complete and accurate in all material respects.

Contrary to the above, on October 14, 2020, Advanced Inspection Technologies, Inc., a licensee of the state of Oklahoma, provided information to the Commission that was not complete and accurate in all material respects. Specifically, Advanced Inspection Technologies, Inc. submitted an NRC Form 241 that failed to include 14 dates

(April 1; June 4; July 12, 14, 17, 23, 29; August 5, 12, 16, 20, 27; and September 2, 9, 2020) on which the company had already performed radiography in Joplin, Missouri. This information is material to the NRC because it is used to determine inspections of the licensee's radiography performed in a Non-Agreement State.

This is a Severity Level IV violation (Enforcement Policy Section 6.9.d).

The NRC has concluded that information regarding: (1) the reason for the violations; (2) the corrective actions taken and planned to correct the violations and prevent recurrence; and (3) the date when full compliance was achieved is already adequately addressed on the docket in this letter and in your letter dated March 8, 2022.

However, if the description therein does not accurately reflect your position or your corrective actions, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation and Proposed Imposition of Civil Penalty (Notice). In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, EA-21-129," and send it to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, and a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, and email it to R4Enforcement@nrc.gov.

You may pay the civil penalty proposed above through one of the following two methods:

1. Submit the payment with the enclosed invoice for Civil Penalty EA-21-129, issued to Advanced Inspection Technologies, Inc., to the following address:

Office of the Chief Financial Officer
U.S. Nuclear Regulatory Commission
P.O. Box 979051
St. Louis, MO 63197

OR

2. Submit the payment in accordance with NUREG/BR-0254.

You may protest the imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should you elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation, EA-21-129," and may: (1) deny the violation(s) listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty. Should you fail to answer or pay the civil penalty within 30 days of the date of this Notice, the NRC may issue an order imposing the civil penalty.

In requesting mitigation of the proposed penalty, the response should address the factors addressed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or

explanation provided pursuant to 10 CFR 2.201 but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the licensee is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., "Reply to a Notice of Violation, EA-21-129" and "Answer to a Notice of Violation, EA-21-129," should be addressed to: Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, and a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, and email it to R4Enforcement@nrc.gov.

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

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you are required to post this Notice within 2 working days of receipt.

Dated this 14th day of June 2022

Civil Penalty Invoice



06/14/2022

Address/Customer Information

Advanced Inspection Technologies, Inc.
3820 Charles Page Blvd
Tulsa, OK 74127

Customer Codes

Account Code: L000003709/1

Bill Information

Bill Number: EA-21-129
Amount Due: \$8,000.00
Due Date: 07/14/2022

Contact Us

Phone Number: 301-415-7554
Fax Number: 301-415-4135
Email Address: Fees.Resource@nrc.gov

Remit to Address

Office of the Chief Financial Officer
U.S. Nuclear Regulatory Commission
P.O. Box 979051
St. Louis, MO 63197

Bill Summary

Initial Charges	\$8,000.00
Discount	0.00
Surcharge	0.00
Interest Charges	0.00
Penalty Charges	0.00
Admin Charges	0.00
Bill Amount	\$8,000.00
Collected	0.00
Applied Credit	0.00
Adjustments	0.00
Amount Due	\$8,000.00

Credit Summary

Applied Credit	\$0.00
Unapplied Credit	0.00
Credit Total	\$0.00

Comments:

For questions, contact the NRC Financial Services and Operations Branch at (301) 415-7554 or by email at Fees.Resource@nrc.gov. For NRC debt collection procedures, including interest and penalty provisions, see 31 U.S.C. 3717, 4 CFR 101-105 and 10 CFR 15. If this invoice is related to an Order Imposing a Civil Penalty, Advanced Inspection Technologies, Inc. is required to pay the Civil Penalty within 30 days of the Order date. If payment is in response to a Notice of Violation and Proposed Imposition of a Civil Penalty, please follow the instructions in the Notice. The NRC may consider a request for additional time to pay the Civil Penalty, including the option to enter into an installment agreement, if appropriate. All requests for additional time to pay an invoice must be submitted in writing, with appropriate justification, to NRCCollections.Resource@nrc.gov, and should be submitted sufficiently ahead of time to allow the NRC time to review the request for additional time to pay within the 30-day payment period. This Invoice is related to the Civil Penalty proposed or imposed under EA-21-129, issued to Advanced Inspection Technologies, Inc. Please include this reference number on your payment method (see attached Payments Methods Brochure)

Customer Information

L000003709/1
Advanced Inspection Technologies, Inc.
3820 Charles Page Blvd
Tulsa, OK 74127

Change of Address:

Phone:

Remittance Information

Office of the Chief Financial Officer
U.S. Nuclear Regulatory Commission
P.O. Box 979051
St. Louis, MO 63197

This Payment References the following Bill:

EA-21-129

Outstanding Amount Due:

\$8,000.00

Amount Enclosed:

NUREG/BR-0254
Payment Methods

QUESTIONS?

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

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

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



Payment Methods

U.S. NUCLEAR REGULATORY COMMISSION
OCFO/DOC/ARB
Mail Stop T-9-E10
Washington, DC 20555-0001
PH (301) 415-7554



NUREG/BR-0254, Rev. 9
June 2019



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

NRC accepts the methods described below.

PAYMENT BY AUTOMATED CLEARINGHOUSE

To pay by Automated Clearinghouse/Electronic Data Interchange (ACH/EDI), provide a copy of NRC Form 628 to your financial institution. You may obtain a copy of NRC Form 628 from the NRC Web site at <http://www.nrc.gov> by searching for "NRC Form 628." You can also obtain a form by calling the NRC Accounts Receivable Help Desk at (301) 415-7554.

PAYMENT BY CREDIT CARD

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

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



PAYMENT BY FEDWIRE DEPOSIT SYSTEM

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

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

The diagram shows a structured EFT message with the following fields and annotations:

- 1**: TO (021030004)
- 2**: FROM (021030004)
- 3**: FROM (021030004)
- 4**: REF (REFERENCE NUMBER)
- 5**: AMOUNT (\$)
- 6**: ORDERING BANK AND RELATED DATA
- 7**: TREAS NYC/CTR
- 8**: BNF-/AC-31000001 OBI-
- 9**: BNF-/AC-31000001
- 10**: OBI-

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PAYMENT BY CHECK

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

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

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

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

TAXPAYER IDENTIFICATION NUMBER

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