FEB 1 3 1975

Doshat No. 50-244

Rochester Gas and Electric Corporation ATTN: Mr. Edward J. Nelson, President 89 East Avenue Rochester, New York 14604

Gentlemen:

The Commission has issued the enclosed Amendment No. 5 to Provisional Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. This amendment includes Change No. 14 to the Technical Specifications, Appendix A, and is in response to your request dated December 2, 1974.

The amendment incorporates into the R. E. Ginna Nuclear Power Plant Technical Specifications changes to the reporting requirements and the definition of abnormal occurrence. The technical specifications are based on Regulatory Guide 1.16, "Reporting of Operating Information -Appendix A Technical Specifications", Revision 3 and "Instruction Manual, Licensee Event Report File" by the Office of Operations Evaluation, USNRC. We request that you use the formats presented in the Appendices to Regulatory Guide 1.16, Revision 3 and that you report events of the type described under the section "Events of Potential Public Interest". Copy requirements are summarized in Regulatory Guide 10.1, "Compilation of Reporting Requirements for Persons Subject to AEC Regulations". A copy of Regulatory Guide 10.1 is enclosed to assist you in identifying reports that are required by the Commission's regulations set forth in Title 10 Code of Federal Regulations. Reports that are required by the regulations have not been repeated in the Technical Specifications.

This license amendment involves only that portion of your request relating to reporting requirements. The remainder of your proposed Section 6 Administrative Controls is still under review.

Copies of the related Safety Evaluation and the Federal Register Notice also are enclosed.

Sincerely,

Original signed by Robert #: Purple, Chief Operating Reactors Branch #1 Division of Reactor Licensing

(1)

Enc	losure	BØ 4	nd	cci
See	next	Das	të	

	A DECK TO A				
			. s.	· · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
				1	
-					
			 		4
			1		
SURNAME				1	
				T	
				1	
				1	1
and the second data and th				1	1
Earm AEC-210 (Days)		and the second se			1

-318 (Rev. 9-53) AECM 0240 🖈 U.S. GOVI

[☆] U.S. GOVERNMENT PRINTING OFFICE: 1974 - 555-338

Rochester Gas and Electric Corporation

FEB 1 3 1975

- 2'-

Enclosures: 1. Amendment No. 5 2. Regulatory Guide 10.1 3. Safety Evaluation 4. Federal Register Notice cc: w/enclosures Arvin E. Upton, Esquire LeBoeuf, Lamb, Leiby & MacRae 1757 N Street, N. W. Washington, D. C. 20036 Mr. Michael Slade 1250 Crown Point Drive Webster, New York 14580 Rochester Committee for Scientific Information Robert E. Lee, Ph. D. P. O. Box 5236 River Compus Station Rochester, New York 14627 J. Bruce MacDonald, Deputy Commissioner and Counsel New York State Department of Commerce 99 Washington Avenue Albany, New York 12210 Dr. William Seymour Staff Coordinator New York State Department of Commerce New York State Atomic Energy Counc il 99 Washington Street Albany, New York 12210 Lyons Public Library 67 Canal Street Lyons, New York 14489 bcc: JRBuchanan

TBAbernathy

Rochester Public Library 115 South Avenue Rochester, New York 14627 Mr. Robert N. Pinkney Supervisor of the Town of Ontario 107 Ridge Road West Ontario, New York 14519 Mr. Paul Arbesman Environmental Protection Agency Region II Office 26 Federal Plaza New York, New York 10007 DISTRIBUTION: NRC PDR Local PDR Docket ORB#1 Rdg OELD OI&E (3) NDube BJones (w/4 encls) RVollmer JSaltzman (w/o TS) SSheppard TWambach RAPurple SKari (w/o TS) WOMiller BScharf (15) **TJCarter PCollins** SVarga CHebron (Amed only) ACRS (13)

OFFICE	ORB#1	ORB#1	ORB#1	OELD	L:AD/ORe	
SURNAME	SSheppard:kmf	GVW TWambach:km	F RAPurple	H. WILCHINS	KRG	
DATE D	2 /3 /75	213175	213 175	2/7 /75	2 / 12 , /75	· · · · · · · · · · · · · · · · · · ·
Form AEC-318 (Rev. 9	-53) AECM 0240	A U.S. GOVERNMENT	PRINTING OFFICE: 19	74 - 555-338		

ROCHESTER GAS AND ELECTRIC COPPORATION

DOCKET NO. 50-244

R. E. GINNA NUCLEAR POWER PLANT

AMENDHERT TO PROVISIONAL OPERATING LICENSE

Amendment Ro. 5 License No. DPR-18

1. The Nuclear Regulatory Commission (the Commission) has found that:

- A. The application for amendment by Rochester Gas and Electric Corporation (the licensee) dated December 2, 1974, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
- B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
- C. There is reasonable assurance (i) that the activities suthorised by this sumndment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations; and
- D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.
- Accordingly, the license is smended by a change to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Provisional Operating License No. DPR-18 is hereby amended to read as follows:



"2.C.(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 14".

3. This license amendment becomes effective 30 days after the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

·• 8

Original signed by Karl Gollen

Karl R. Goller, Assistant Director for Operating Reactors Division of Reactor Licensing

Attachment: Change No. 14 to Technical Specifications

Date of Issuance: FEB 13 1975



- 2 -

ATTACHMENT TO LICENSE AMENDMENT NO. 5

CHANGE NO. 14 TO THE TECHNICAL SPECIFICATIONS

FACILITY OPERATING LICENSE NO. DPR-18

DOCKET NO. 50-244

Revise Appendix A as follows:

.

- 1. Remove pages 1-3 and 1-4. Insert new page 1-3.
- 2. Replace section 6.6 (pages 6.6-1 through 6.6-9) with revised section 6.6 (pages 6.6-1 through 6.6-10).

Containment Integrity

1.8

Containment integrity is defined to exist when:

- a. All non-automatic containment isolation valves which are not required to be open during accident conditions are closed and blind flanges are installed where required.
- b. The equipment door is properly closed and sealed.
- c. At least one door in each personnel air lock is properly closed and sealed.
- d. All automatic containment isolation valves are operable, secured in the closed position or isolated by closed manual valves or flanges as permitted by Limiting Conditions for Operation.
- e. The containment leakage satisfies Technical Specification
 4.4.

1.9 Quadrant Power Tilt

The ratio of highest average nuclear power in any quadrant to the average nuclear power in the four quadrants. If one excore detector is out of service, the three inservice units are used in computing the average.

1--3

6.6 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

1. Routine Reports

8.

Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

b. <u>Annual Operating Report</u>.^{1/} Routine operating reports covering the operation of the unit during the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

The annual operating reports made by licensees shall provide a comprehensive summary of the operating experience gained during the year, even though some repetition of previously reported information may be involved. References in the annual operating report to previously submitted reports shall be clear.

Each annual operating report shall include:

- (1) A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in item 1.b.(2)(e) below.
- (2) For each outage or forced reduction in $power^{2/}$ of over twenty percent of design power level where the reduction extends for greater than four hours:
 - (a) the proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction);
 - (b) a brief discussion of (or reference to reports of) any abnormal occurrences pertaining to the outage or power reduction;
 - (c) corrective action taken to reduce the probability of recurrence, if appropriate;
 - (d) operating time lost as a result of the outage or power reduction (for scheduled or forced outages, use the generator off-line hours; for forced reductions in power, use the approximate duration of operation at reduced power);
 - (e) a description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and
 - (f) a report of any single release of radioactivity or radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

6.6-2

- (3) A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, - e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work
- (4) Indications of failed fuel resulting from irradiated fuel examinations, including eddy current tests, ultrasonic tests, or visual examinations completed during the report period.
- c. <u>Monthly Operating Report</u>. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate Regional Office, to arrive no later than the tenth of each month following the calendar month covered by the report.

2. Abnormal Occurrences

Abnormal occurrences, including corrective actions and measures to prevent reoccurrence, shall be reported to the NRC. In general, the importance of an occurrence with respect to safety significance determines the immediacy of reporting required. In some cases, however, the significance of an event may not be obvious at the time of its occurrence. In such cases, the NRC shall be informed promptly of an increased significance in the licensee's assessment of the event. In addition, supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

6.6-3

FEB 1 3 1975



- (1) Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the technical specifications or failure to complete the required protective function.
- Note: Instrument drift discovered as a result of testing need not be reported under this item but may be reportable under items 2.a(5), 2.a(6), or 2.b(1) below.
- (2) Operation of the unit or affected systems when any parameter or operation subject to a limiting condition is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
- Note: If specified action is taken when a system is found to be operating between the most conservative and the least conservative aspects of a limiting condition for operation listed in the technical specifications, the limiting condition for operation is not considered to have been violated and need not be reported under this item, but it may be reportable under item 2.b(2) below.
- (3) Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.
- Note: Leakage of valve packing or gaskets within the limits for identified leakage set forth in technical specifications need not be reported under this item.

6.6-4

[4]

Reactivity anomalies, involving disagreement with the predicted value of reactivity balance under steady state conditions during power operation, greater than or equal to $1X \ Ak/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if sub-critical, an unplanned reactivity insertion of more than 0.5% Ak/k; or occurrence of any unplanned criticality.

- (5) Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR.
- (6) Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.
 - Note: For items 2.a(5) and 2.a(6) reduced redundancy that does not result in a loss of system function need not be reported under this section but may be reportable under items 2.b(2) and 2.b(3) below.
- (7) Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- (8) Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- (9) Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases; or discovery during plant life of conditions not specifically conaidered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

6.6-5

Note: This item is intended to provide for reporting of potentially generic problems.

- b. Thirty Day Written Reports. The abnormal occurrences discussed below have lesser immediate importance than those described under 2.a above. Such events shall be the subject of written reports to the Director of the appropriate Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.
 - (1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
 - (2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.
 - Note: Routine surveillance testing, instrument calibration, or preventative maintenance which require system configurations as described in items 2.b(1) and 2.b(2) need not be reported except where test results themselves reveal a degraded mode as described above.
 - (3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
 - (4) Abnormal degradation of systems other than those specified in item 2.a(3) above designed to contain radioactive material resulting from the fission process.
 - Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in technical specifications need not be reported under this item.

6.0-0

FFB 13 1995

Unique Reporting Requirements

3.

a. Environmental Monitoring

An Annual Environmental Operating Report covering the results of the environmental monitoring program during the previous calendar year shall be submitted prior to March 1 of each year. Each Annual Environmental Operating Report shall include:

- (1) Descriptive material covering the off-site environmental surveys performed during the reporting period including information on:
 - (a) The number and types of samples taken; e.g., air, lake bottom, surface water, milk, soil, biota.
 - (b) The number and types of measurements made:
 e.g., dosimetry.
 - (c) Locations of the sample points and monitoring stations.
 - (d) The frequency of the surveys.
 - (e) A summary of survey results.
- (2) If a particular sample or measurement indicates statistically significant levels of radioactivity above established or concurrent backgrounds, the following information shall be provided:
 - (a) The type of analysis performed; e.g., alpha, beta, gamma, and/or isotopic.
 - (b) The minimum sensitivity of the monitoring system.
 - (c) The measured radiation level or sample concentration.
 - (d) The applicable established limit.
 - (e) The specific times when samples were taken and measurements were made.
 - (f) An estimate of the likely resultant exposure to the public.

6.6-7

b. Semi-annual Effluent Release Report

Within 60 days after January 1 and July 1 of each year a report shall be submitted covering the radioactive content of effluents released to unrestricted areas during the previous six months of operation. The data shall be summarized on a monthly basis and include as a minimum:

- (1) Radioactive Liquid Waste
 - (a) Gross radioactivity (β,) released (in curies)
 and average concentration released to the unrestricted
 area.
 - (b) Total tritium and alpha radioactivity (in curies) released and average concentration released to the unrestricted area.
 - (c) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.
 - (d) Total volume (in liters) of liquid waste released.

14

FEB 13

- (e) Total volume (in liters) of dilution water used prior to release from the restricted area.
- (f) The maximum concentration of gross radioactivity (β,) released to the unrestricted area (averaged over the period of release).
- (g) Total radioactivity (in curies) released, by nuclide, based on representative isotopic analyses performed.
- (h) Percent of Technical Specification limit for total activity released.
- (2) Gaseous Waste
 - (a) Total radioactivity (in curiex) releases of noble and activation gases.
 - (b) Maximum noble gas release rate during any onehour period.

6.6-8

- (c) Total radioactivity (in curies) released, by nuclide, based on representative isotopic analyses performed.
- (d) Percent of Technical Specification limit.
- (3) Iodine Releases
 - (a) Total (I-131, I-133, I-135) radioactivity (in curies) released.
 - (b) Total radioactivity (in curies) released, by nuclide, based on representative isotopic analyses performed.
 - (c) Percent of Technical Specification limit.
- (4) Particulate Releases
 - (a) Gross radioactivity (β,) released (in curies) excluding background radioactivity.
 - (b) Gross alpha radioactivity released (in curies) excluding background radioactivity.
 - (c) Total radioactivity released (in curies) of nuclides with half-lives greater than eight days.
 - (d) Percent of Technical Specification limit.
- (5) Solid Radioactive Waste
 - (a) Total volume (in cubic feet) of solid waste generated.
 - (b) Gross curie activity involved.
 - (c) Dates and disposition of the material if shipped offsite.

6.6-9

FEB 1 3 1975

POOTNOTFS

- 1. A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.
- 2. The term "forced reduction in power" is normally defined in the electric power industry as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.
- 3. The term "forced outage" is normally defined in the electric power industry as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.
- This tabulation supplements the requirements of \$20.407 of 10 CFR Part
 20.

6.6-10

SAFETY EVALUATION BY THE DIVISION OF REACTOR LICENSING

SUPPORTING AMENDMENT NO. 5 TO PROVISIONAL OPERATING LICENSE BO. DPR-18

CHARGE NG. 14 TO TECHNICAL SPECIFICATIONS

ROCHESTER GAS AND ELECTRIC CORPORATION

B. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

Introduction

By letter dated December 2, 1974, Rochester Gas and Electric Corporation requested changes to the Technical Specifications appended to Provisional Operating License DFR-18, for the R. E. Ginna Nuclear Power Plant. The proposed amendment includes changes to reporting requirements, to the definition of abnormal occurrences, and to other parts of the Administrative Control Section. This safety evaluation and the amendment it supports involves only the first two of these proposed changes.

Discussion

The proposed amendment would be administrative in nature. One of the proposed changes would delete the existing definition of abnormal occurrence and replace it with one that will become used throughout the nuclear industry. The other change, to reporting requirements, identifies the reports required of all licensees not already identified by the regulations and those unique to this facility. The proposal would formalize present reporting and would delete any reports no longer needed for assessment of safety related activities.

2

Evaluation

The new guidance for defining abnormal occurrences uses the safety significance of an occurrence to determine the immediacy of reporting. The proposed reporting requirements delete reporting of information no longer required and duplication of reported information. The standardization of required reports and desired format for the information will permit more rapid recognition of potential problems.



During our review of the proposed amendment, we found that certain modifications to the proposal were necessary to have conformance with the desired regulatory position. Following discussion with the licensee, these modifications were made.

We have concluded that the proposal as modified improves the licensee's program for evaluating plant performance and the reporting of the operating information needed by the Commission to assess safety related activities and is acceptable. The modified reporting program is consistent with the guidance provided by Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications", Revision 3.

Conclusion

We have concluded that the authorization of this amendment does not involve a significant hazards consideration. We also conclude that there is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: FEB 1 3 1975



🛧 U.S. GOVERNMENT PRINTING OFFICE: 1974 - 555-338

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-244

ROCHESTER GAS AND ELECTRIC CORPORATION NOTICE OF ISSUANCE OF AMENDMENT TO PROVISIONAL OPERATING LICENSE

Notice is hereby given that the U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 5 to Provisional Operating License No. DPR-18 issued to Rochester Gas and Electric Corporation which revised Technical Specifications for operation of the R. E. Ginna Nuclear Power Plant located in Wayne County, New York. The amendment becomes effective 30 days after the date of issuance.

This amendment revises the reporting requirements of the Technical Specifications for the R. E. Ginna Nuclear Power Plant.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment is not required since the amendment does not involve a significant hazards consideration.

For further details with respect to this action, see (1) the application for amendment dated December 2, 1974, (2) Amendment No. 5 to License No. DPR-18, with Change No. 14, and (3) the Commission's related Safety Evaluation. All of these items are available for public

		1	•			
OFFICE		· · ·	1	1		
•						1
	· ·					I
						
SURNAME						1 · · · ·
- 1			· · ·			
DATE	1			•		
						(· · · · ·
DIM AEC-318 (Rev. 9-53	I APT IN TRACTOR AND INCOMENTS IN THE	and the second				4. · · · · · · · · · · · · · · · · · · ·
	, TEOM 0240	W U.S. GOVERNM	ENT PRINTING OFFICE: 10	the state of the second st	And present doctoring and a fair the straight the second	
					the second s	And the set of the set

inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C., and at the Lyons Public Library, 67 Canal Street, Lyons, New York 14489 and at the Rochester Public Library, 115 South Avenue, Rochester, New York 14627.

A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Reactor Licensing.

Dated at Bethesda, Maryland, this day of FFB 13 1975

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by R. A. Purple Robert A. Purple, Chief Operating Reactors Branch #1 Division of Reactor Licensing

·	· · · · · · · · · · · · · · · · · · ·			1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	•	
OFFICE						
SURNAME						
Form AEC-318 (Rev. 9-5	3) AECM 0240	U.S. GOVERNA	ENT PRINTING OFFICE IN	the second s	and the state of the	

- 2 -