

August 10, 1992

Docket No. 50-443

Mr. Ted C. Feigenbaum, President  
and Chief Executive Officer  
North Atlantic Energy Service Corporation  
Post Office Box 300  
Seabrook, New Hampshire 03874

Dear Mr. Feigenbaum:

SUBJECT: ISSUANCE OF AMENDMENT NO.13 TO FACILITY OPERATING LICENSE NO.  
NPF-86 - SEABROOK STATION, UNIT NO. 1 (TAC NO. M83080)

The Commission has issued the enclosed Amendment No. 13 to Facility Operating License No. NPF-86 for the Seabrook Station. This amendment is in response to your application, dated March 20, 1992, as supplemented on June 19, 1992, and July 1, 1992.

This amendment changes the Technical Specifications for the Seabrook Station to decouple the loss of offsite power/safety injection test from the 24-hour diesel generator surveillance run. The test will still be performed, but can be scheduled for a different time during the refueling outage so as to alleviate test scheduling difficulties and the financial burden that would result from an extended outage.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly FEDERAL REGISTER notice.

Sincerely,

/s/

Gordon Edison, Senior Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.13 to License No. NPF-86
2. Safety Evaluation

cc w/enclosures:  
See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

August 10, 1992

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Sincerely,

A handwritten signature in cursive script that reads "Gordon Edison".

Gordon Edison, Senior Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

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cc w/enclosures:  
See next page

Mr. Ted C. Feigenbaum

Seabrook

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Seabrook

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AMENDMENT NO. 13 TO NPF-86 SEABROOK STATION DATED August 10, 1992

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NORTH ATLANTIC ENERGY SERVICE CORPORATION, ET AL.\*

DOCKET NO. 50-443

SEABROOK STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 13  
License No. NPF-86

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
  - A. The application for amendment filed by the North Atlantic Energy Service Corporation (NAESCO) (the licensee), acting for itself and as agent and representative of the 11 other utilities listed below and hereafter referred to as licensees, dated March 20, 1992, as supplemented on June 19, 1992, and July 1, 1992, 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 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 set forth in 10 CFR Chapter I;
  - 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; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

\*North Atlantic Energy Service Corporation is authorized to act as agent for the: North Atlantic Energy Corporation, the Canal Electric Company, The Connecticut Light and Power Company, EUA Power Corporation, Hudson Light & Power Department, Massachusetts Municipal Wholesale Electric Company, Montaup Electric Company, New England Power Company, New Hampshire Electric Cooperative, Inc., Taunton Municipal Light Plant, The United Illuminating Company, and Vermont Electric Generation and Transmission Cooperative, Inc., and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-86 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.13 and the Environmental Protection Plan contained in Appendix B are incorporated into Facility License No. NPF-86. NAESCO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of receipt of this letter.

FOR THE NUCLEAR REGULATORY COMMISSION



Victor Nerses, Acting Director  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: August 10, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 13

FACILITY OPERATING LICENSE NO. NPF-86

DOCKET NO. 50-443

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overlap pages have been provided.

<u>Remove</u>	<u>Insert</u>
3/4 8-3	3/4 8-3
3/4 8-4	3/4 8-4
3/4 8-6	3/4 8-6
3/4 8-7	3/4 8-7
3/4 8-8	3/4 8-8
3/4 8-9	3/4 8-9
3/4 8-10	3/4 8-10

## ELECTRICAL POWER SYSTEMS

### A.C SOURCES

#### OPERATING

### SURVEILLANCE REQUIREMENTS

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4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Class 1E Distribution System shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:\*

- a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:
  - 1) Verifying the fuel level in the day fuel tank;
  - 2) Verifying the fuel level in the fuel storage tank;
  - 3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank;
  - 4) Verifying the lubricating oil inventory in storage;
  - 5) Verifying the diesel starts from standby conditions and accelerates to at least 514 rpm in less than or equal to 10 seconds. The generator voltage and frequency shall be  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz within 10 seconds after the start signal. The diesel generator shall be started for this test by using one of the following signals:
    - a) Manual, or
    - b) Simulated loss-of-offsite power by itself, or

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\*All planned starts for the purpose of these surveillances may be preceded by an engine prelube period.

## ELECTRICAL POWER SYSTEMS

### A.C. SOURCES

#### OPERATING

#### SURVEILLANCE REQUIREMENTS

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##### 4.8.1.1.2 (Continued)

- c) Simulated loss-of-offsite power in conjunction with an SI Actuation test signal, or
  - d) An SI Actuation test signal by itself.
- 6) Verifying the generator is synchronized, loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW\*\*, and operates with a load greater than or equal to 5600 kW and less than or equal to 6100 kW for at least 60 minutes; and
- 7) Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tank;
  - c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;
  - d. By sampling new fuel oil in accordance with ASTM-D4057-81 prior to addition to storage tanks and:
    - 1) By verifying in accordance with the tests specified in ASTM-D975-81 prior to addition to the storage tanks that the sample has:
      - a) An API Gravity of within 0.3 degree at 60°F, or a specific gravity of within 0.0016 at 60/60°F, when compared to the supplier's certificate, or an absolute specific gravity at 60/60°F of greater than or equal to 0.81 but less than or equal to 0.89, or an API gravity of greater than or equal to 28 degrees but less than or equal to 42 degrees;

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\*\*Diesel generator loading may be in accordance with manufacturers recommendations, including a warmup period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

# ELECTRICAL POWER SYSTEMS

## A.C. SOURCES

### OPERATING

#### SURVEILLANCE REQUIREMENTS

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##### 4.8.1.1.2 (Continued)

- b) A kinematic viscosity at 40°C of greater than or equal to 1.9 centistokes, but less than or equal to 4.1 centistokes, if gravity was not determined by comparison with the supplier's certification;
  - c) A flash point greater than or equal to 125°F; and
  - d) A clear and bright appearance with proper color when tested in accordance with ASTM-D4176-82.
- 2) By verifying within 30 days of obtaining the sample that the other properties specified in Table 1 of ASTM-D975-81 are met when tested in accordance with ASTM-D975-81 except that the analysis for sulfur may be performed in accordance with ASTM-D1552-79 or ASTM-D2622-82.
- e. At least once every 31 days:
    - 1) By obtaining a sample of fuel oil in accordance with ASTM-D2276-78, and verifying that total particulate contamination is less than 10 mg/liter when checked in accordance with ASTM-D2276-78, Method A, and
    - 2) By visually inspecting the lagging in the area of the flanged joints on the silencer outlet of the diesel exhaust system for leakage (also after an extended operation of greater than 24 hours).
  - f. At least once per 18 months, during shutdown, by:
    - 1) Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service;
    - 2) Verifying the generator capability to reject a load of greater than or equal to 671 kW while maintaining voltage at  $4160 \pm 420$  volts and frequency at  $60 \pm 4.0$  Hz;
    - 3) Verifying the generator capability to reject a load of 6083 kW without tripping. The generator voltage shall not exceed 4784 volts during and following the load rejection;
    - 4) Simulating a loss-of-offsite power by itself, and:

## ELECTRICAL POWER SYSTEMS

### A.C. SOURCES

#### OPERATING

### SURVEILLANCE REQUIREMENTS

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#### 4.8.1.1.2 (Continued)

- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses, and
  - b) Verifying the diesel starts from standby conditions on the loss of offsite power signal, energizes the emergency busses with permanently connected loads within 12 seconds, energizes the auto-connected shutdown loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz during this test.
- 5) Verifying that on an SI actuation test signal, without loss-of-offsite power, the diesel generator starts from standby conditions, on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz within 10 seconds after the auto-start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test;
- 6) Simulating a loss-of-offsite power in conjunction with an SI actuation test signal; and
- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses;
  - b) Verifying the diesel starts from standby conditions, on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected emergency (accident) loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz during this test; and
  - c) Verifying that all automatic diesel generator trips, except engine overspeed, low lube oil pressure, 4160-volt bus fault, and generator differential, are automatically bypassed upon loss of voltage on the emergency bus concurrent with a Safety Injection actuation signal.

## ELECTRICAL POWER SYSTEMS

### A.C. SOURCES

#### OPERATING

#### SURVEILLANCE REQUIREMENTS

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##### 4.8.1.1.2 (Continued)

- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 6363 kW and less than or equal to 6700 kW.\*\* During the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW. The generator voltage and frequency shall be  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, verify that the diesel generator starts on a manual or auto start signal, attains generator voltage and frequency of  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz within 10 seconds, and operates for longer than 5 minutes.\*\*\*
- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the short time rating of 6697 kW;
- 9) Verifying the diesel generator's capability to:
  - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
  - b) Transfer its loads to the offsite power source, and
  - c) Be restored to its standby status.

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\*\*Diesel generator loading may be in accordance with manufacturers recommendations, including a warmup period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

\*\*\*If the diesel generator fails to start during this test, then it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at greater than or equal to 5600 kW and less than or equal to 6100 kW for 2 hours or until operating temperature has stabilized. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

## ELECTRICAL POWER SYSTEMS

### A. C. SOURCES

#### OPERATING

#### SURVEILLANCE REQUIREMENTS

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##### 4.8.1.1.2 (Continued)

- 10) Verifying that with the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
  - 11) Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross-connection lines;
  - 12) Verifying that the emergency power sequence timer is OPERABLE with the interval between each load block within  $\pm 10\%$  of its design interval;
  - 13) Verifying that the following diesel generator lockout features prevent diesel generator starting:
    - a) Barring device engaged, or
    - b) Differential lockout relay.
  - 14) Simulating a Tower Actuation (TA) signal while the diesel generator is loaded with the permanently connected loads and auto-connected emergency (accident) loads, and verifying that the service water pump automatically trips, and that the cooling tower pump and fan(s) automatically start. After energization the steady state voltage and frequency of the emergency buses shall be maintained at  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz; and
  - 15) While diesel generator 1A is loaded with the permanently connected loads and auto-connected emergency (accident) loads, manually connect the 1500 hp startup feedwater pump to 4160-volt bus E5. After energization the steady-state voltage and frequency of the emergency bus shall be maintained at  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz.
- g. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously, during shutdown, and verifying that both diesel generators accelerate to at least 514 rpm in less than or equal to 10 seconds; and

## ELECTRICAL POWER SYSTEMS

### A. C. SOURCES

#### OPERATING

#### SURVEILLANCE REQUIREMENTS

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##### 4.8.1.1.2 (Continued)

h. At least once per 10 years by:

- 1) Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution, or equivalent, and
- 2) Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110% of the system design pressure.

4.8.1.1.3 Reports - All diesel generator failures, valid or nonvalid, shall be reported to the Commission in a Special Report pursuant to Specification 6.8.2 within 30 days. Reports of diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977. If the number of failures in the last 100 valid tests (on a per nuclear unit basis) is greater than or equal to 7, the report shall be supplemented to include the additional information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

TABLE 4.8-1

DIESEL GENERATOR TEST SCHEDULE

<u>NUMBER OF FAILURES IN LAST 20 VALID TESTS*</u>	<u>NUMBER OF FAILURES IN LAST 100 VALID TESTS*</u>	<u>TEST FREQUENCY</u>
$\leq 1$	$\leq 5$	At least once per 31 days
$\geq 2$	$\geq 6$	At least once per 7 days**

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\*Criteria for determining the number of failures and number of valid tests shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1, August, 1977, but determined on a per diesel generator basis.

For the purpose of determining the required test frequency, the previous test failure count may be reduced to zero if a complete diesel overhaul to like-new condition is completed, provided that the overhaul, including appropriate post-maintenance operation and testing, is specifically approved by the manufacturer and if acceptable reliability has been demonstrated. The reliability criterion shall be the successful completion of 14 consecutive tests in a single series in accordance with the routine Surveillance Requirements of 4.8.1.1.2.a.5 and 4.8.1.1.2.a.6. If this criterion is not satisfied during the first series of tests, any alternate criterion to be used to transvalue the failure count to zero requires NRC approval.

\*\*This test frequency shall be maintained until seven consecutive failure-free demands have been performed and the number of failures in the last 20 valid demands has been reduced to one or less.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 13 TO FACILITY OPERATING LICENSE NO. NPF-86  
NORTH ATLANTIC ENERGY SERVICE CORPORATION  
SEABROOK STATION, UNIT NO. 1  
DOCKET NO. 50-443

1.0 INTRODUCTION

By letter dated March 20, 1992, as supplemented on June 19, 1992, and July 1, 1992, the North Atlantic Energy Service Corporation (the licensee) submitted a request to revise diesel generator (DG) surveillance requirements for Seabrook Station, Unit 1. The proposed changes would eliminate (1) the requirements to sequence on the Loss of Offsite Power (LOOP)/Safety Injection (SI) loads from the 24-hour DG surveillance 4.8.1.1.2f.7, and (2) the requirements for rapid loading of surveillance requirement 4.8.1.1.2.a.6. The proposed changes would also provide a load range, where applicable, to preclude routine overload of the DGs during surveillance testing. Currently, this LOOP/SI surveillance can only be performed near the end of the outage when all of the required engineered safety features (ESF) equipment is returned to service. By requiring a LOOP/SI test near the end of the outage, the outage is extended for a minimum of 48 hours, for testing of both diesel generators. Eliminating this extension alleviates the scheduling difficulties and the associated financial burden due to the need to purchase replacement power for the additional period. The proposed revision to the diesel generator Surveillance Requirements will meet the intent of Regulatory Guide 1.108. The July 1, 1992, letter provided clarifying information that did not change the proposed no significant hazards consideration determination. The staff's evaluation of the proposed Technical Specification (TS) changes follows.

2.0 EVALUATION

The current TS Surveillance Requirement 4.8.1.1.2f.7 verifies DG hot restart capability by initiating a LOOP/SI test within 5 minutes of completing the DG 24-hour DG run. The licensee has stated that this test creates significant scheduling demand during an outage by reducing schedule flexibility and imposing unnecessary operating burden. The licensee has proposed to revise the method of verifying DG hot restart capability. The revised surveillance requirement will verify DG hot restart capability by either manually or automatically starting the DG and verifying that it attains rated voltage and frequency within the required time. The requirement to sequence on the LOOP/SI loads will be deleted. The staff finds the above proposed TS change to be consistent with the Improved Standard TS and is acceptable.

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PDR

Since the LOOP/SI test will no longer be used during Surveillance Requirement 4.8.1.1.2f.7, the note at the bottom of page 3/4 8.7 is reworded to delete the reference to this test. Additionally, the requirement to run the DG for 1 hour to achieve normal operating temperature is increased to 2 hours. The staff finds the above requirement to be consistent with the Improved Standard TS and is acceptable.

Surveillance Requirement 4.8.1.1.2a.6 specifies in part that at least once per 184 days the DG be rapidly loaded to greater than or equal to 6083 KW in 120 seconds or less. This test introduces mechanical stress and wear on the engine. The licensee has proposed to load the DG gradually during this surveillance requirement. The staff finds the above proposed change to be consistent with Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," and is acceptable.

A load range has been proposed to preclude overloading of the DG during surveillance testing. Specifically, a load of "greater than or equal to 6083 KW" has been proposed to be replaced by a load range of "greater than or equal to 5600 KW and less than or equal to 6100 KW" in Surveillance Requirements 4.8.1.1.2a.6, 4.8.1.1.2f.7, and to the note at the bottom of page 3/4 8-7. Similarly, the 2-hour load rating specified in Surveillance Requirement 4.8.1.1.2f.7 is changed to a load range of "greater than or equal to 6363 KW and less than or equal to 6700 KW." The staff finds the above TS changes to be consistent with the Improved Standard TS and is acceptable.

The licensee has proposed to delete the second sentence of the note at the bottom of page 3/4 8-3. The note will now state, "All planned starts for the purpose of these surveillances may be preceded by an engine prelube period." The second sentence with regard to gradual acceleration is being deleted since the Seabrook Station DGs are not designed to gradually accelerate to operating speed.

In addition, the licensee has proposed to apply the above revised note to the entire Surveillance Requirement of 4.8.1.1.2 since the engine prelube option is applicable to all test starts. The staff finds the above changes to be consistent with the Improved Standard TS and acceptable.

The licensee has proposed to replace the term "ambient condition" with the term "standby conditions" in Surveillance Requirements 4.8.1.1.2a.5. The term "standby conditions" is inserted in Surveillance Requirements 4.8.1.1.2f.4b, 4.8.1.1.2f.5, and 4.8.1.1.2f.6b. This term (standby conditions) more accurately describes the condition in which the DGs are maintained and accounts for the jacket water and lube oil warming systems which are continually in operation. The staff finds the above term to be consistent with the term used in the Improved Standard TS and is acceptable.

In addition to the above changes, several notes have been revised or added. The purpose of the changes is to provide amplifying information for the applicable TS to enhance and improve its clarity. The staff has reviewed these notes and finds them to be acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (57 FR 30258). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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