

MAR 14 1983

Docket Nos. 50-325
50-324

Mr. E. E. Utley
Executive Vice President
Carolina Power & Light Company
P. O. Box 1551
Raleigh, North Carolina 27602

Dear Mr. Utley:

The Commission has issued the enclosed Orders confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. These Orders are based on commitments contained in your letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively.

The Orders reference your letters and, in their Attachments, contain lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Orders, several of the items listed in Generic Letter 82-10 will be handled outside of these Orders.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Orders require implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the Attachments to the Orders are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

OFFICE
SURNAME	B303300047	B30314
DATE	PDR	ADOCK	05000324
	P		PDR

Mr. E. E. Utley

- 2 -

Copies of these Orders are being filed with the Office of the Federal Register for publication.

Sincerely,

ORIGINAL SIGNED BY

VL Rooney for

Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Enclosure:
Orders

cc w/enclosure:
See next page

Dist:	Docket File	SECY	ELJordan
NRC PDR	NSIC	JHeltemes	JMTaylor
LPDR	ORB#2 Reading	ORAB	DEisenhut
SNorris	JVanVliet	OELD	TBarnhart(4)
RDiggs	ASLAB	Extra-5	Gray
ACRS-10	OPA, C. Miles		

OFFICE	DL:ORB#2 SNorris	DL:ORB#2 JVanVliet	DL:ORB#2 DVassallo	DL:OR GLainas	DL:D DEisenhut	<i>Edley</i>	<i>Joe</i>
SURNAME	TL182	V1.3.182	V1.3.182	TL182	TL14.183	<i>3/3/83</i>	<i>ORAB</i>
DATE	12	12		3			3/4/83

Mr. E. E. Utley
Carolina Power & Light Company

cc:

Richard E. Jones, Esquire
Carolina Power & Light Company
336 Fayetteville Street
Raleigh, North Carolina 27602

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

Mr. Charles R. Dietz
Plant Manager
P. O. Box 458
Southport, North Carolina 28461

Mr. Franky Thomas, Chairman
Board of Commissioners
P. O. Box 249
Bolivia, North Carolina 28422

Mrs. Chrys Baggett
State Clearinghouse
Budget & Management
116 West Jones Street
Raleigh, North Carolina 27603

U. S. Environmental Protection Agency
Region IV Office
Regional Radiation Representative
345 Courtland Street, N. W.
Atlanta, Georgia 30308

Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 1057
Southport, North Carolina 28461

James P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

The licensee responded to Generic Letter 82-05 by letters dated April 23, June 24, and December 6, 1982; the licensee responded to Generic Letter 82-10 by letters dated June 9, and December 6, 1982. In these submittals, the licensee confirmed that some of the items identified in the Generic Letters had been completed, took technical exception to one item, and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

Generic Letters 82-05 and 82-10 applied to 16 and 10 items, respectively, for BWRs with jet pumps. Of the 10 items listed in Generic Letter 82-10, six items are not included in this Order. Item I.A.1.3.2 is part of a separate rulemaking; Items I.C.1, III.A.1.2 (2 items), and III.A.2.2 will be handled separately following Commission actions that would proceed as a result of its consideration of SECY 82-111, as amended; and Item II.K.3.30 and II.K.3.31 (one item) is not required until one year after staff approval of the generic model and staff review of these models has not been completed.

Eleven of the 20 items addressed in this Order are considered by the licensee to be completed or to require no modifications. The licensee is taking technical exception to one item, II.E.4.2.7, that will be addressed in a separate action and is therefore not included in this Order. The staff's evaluation of the licensee's delays for the remaining eight items is provided herein:

II.B.3 Post Accident Sampling

This item will be delayed by the licensee and will be completed by June 1, 1983. The installation delay has been caused by prolonged equipment procurement and delivery schedules. Installation will be performed during the Fall 1982 outage. The licensee also anticipates substantial test and checkout before the system can be declared operational. The licensee has implemented interim compensatory measures.

II.F.1 (1-6) Post-Accident Monitoring (6 items)

The licensee will delay three items, II.F.1.3, II.F.1.5, and II.F.1.6, until June 1, 1983. The licensee asserts that item II.F.1.4 is complete. The licensee anticipates no difficulties completing items II.F.1.3, II.F.1.5 and II.F.1.6 during the upcoming fall outage (refueling outage prior to the start of Cycle 4). With respect to items II.F.1.1 and II.F.1.2, the licensee has experienced significant delays in the development, procurement and delivery of the isokinetic sample probes and in the procurement and delivery of the needed cabling. In addition, certain aspects of the installation will require concurrent outages of the Units 1 and 2. The licensee intends to perform this specific aspect during a brief dual-unit outage during the 1982 fall refueling outage on Brunswick Unit 1. However, should that not prove to be feasible, the licensee will, in any event, complete items II.F.1.1 and II.F.1.2 on both units prior to June 1, 1983.

II.K.3.22 RCIC Suction Automatic Transfer

The licensee has committed to complete this item during the upcoming fall 1982 refueling outage. The short-term requirement to insure that procedures adequately address manual suction transfer and when it is needed has been completed.

II.K.3.18 ADS Actuation

The BWR Owners Group generic submittal was made on October 29, 1982. The licensee is assessing the applicability of that submittal to the facility and will provide a plant-unique submittal by February 28, 1983.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the delays; and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the

licensee's submittals noted in Section III herein no later than the dates in the Attachments.

V.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14th day of March 1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions	Complete
II.B.3	Post-Accident Sampling	1/1/82	Install upgraded post-accident sampling capability	6/1/83
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation	Complete
		7/1/81	Part 7-isolate purge* & vent valves on radiation signal	Technical Exception
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors	6/1/83
		1/1/82	(2) Provide capability for effluent monitoring of iodine	6/1/83
		1/1/82	(3) Install in-containment radiation-level monitors	Prior to start of Cycle 4 (6/1/83)

*Not Part of Confirmatory Order

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
II.F.1		1/1/82	(4) Provide continuous indication of containment pressure	Complete
		1/1/82	(5) Provide continuous indication of containment water level	Prior to start of Cycle 4 (6/1/83)
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment	Prior to start of Cycle 4 (6/1/83)
II.K.3.15	Isolation of HPCI & RCIC Modification	7/1/81	Modify pipe break detection logic to prevent inadvertent isolation	Complete
II.K.3.22	RCIC Suction	1/1/82	Modify design of RCIC suction to provide automatic transfer to torus	Prior to start of Cycle 4 (5/83)
II.K.3.24	Space Cooling for HPCI/RCIC	1/1/82	Confirm the adequacy of space cooling for HPCI/RCIC	Complete
II.K.3.27	Common reference level	7/1/81	Provide common reference level for vessel level instrumentation	Complete

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
1.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd 6/15/82	Complete
1.A.1.3.2	Minimum Shift* Crew	To be superseded by Proposed Rule	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units	To be addressed when Final Rule is issued
I.C.1	Revise Emergency* Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test	7/1/81	Submit plant specific reports on relief and safety valve program	Complete
II.K.3.18	ADS Actuation	9/30/82	Submit revised position on need for modifications	2/28/83
II.K.3.30 & 31	SBLOCA Analysis*	1 yr. after staff approval of model	Submit plant specific analyses	To be determined following staff approval of model
III.A.1.2	Staffing Levels* for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined

*Not Part of Confirmatory Order

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
III.A.1.2	Upgrade Emer* gency Support Facilities	Superseded by SECY 82-111	Reference SECY 82- 111, Requirements for Emergency Response Capability	To be determined
III.A.2.2	Meteorological* Data	Superseded by SECY 82-111	Reference SECY 82- 111, Requirements for Emergency Response Capability	To be determined
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	Complete

*Not Part of Confirmatory Order

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

The licensee responded to Generic Letter 82-05 by letters dated April 23, June 24, July 1, and December 6, 1982; the licensee responded to Generic Letter 82-10 by letters dated June 9, and December 6, 1982. In these submittals, the licensee confirmed that some of the items identified in the Generic Letters had been completed, took technical exception to one item, and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

Generic Letters 82-05 and 82-10 applied to 16 and 10 items, respectively for BWRs with jet pumps. Of the 10 items listed in Generic Letter 82-10, six items are not included in this Order. Item I.A.1.3.2 is part of a separate rulemaking; Items I.C.1, III.A.1.2 (2 items), and III.A.2.2 will be handled separately following Commission actions that would proceed as a result of its consideration of SECY 82-111, as amended; and Item II.K.3.30 and II.K.3.31 (one item) is not required until one year after staff approval of the generic model and staff review of these models has not been completed.

Thirteen of the 20 items addressed in this Order are considered by the licensee to be completed or to require no modifications. The licensee is taking technical exception to one item, Item II.E.4.2.7, that will be addressed in a separate action and is therefore not included in this Order. The staff's evaluation of the licensee's delays for the remaining six items is provided herein:

II.B.3 Post Accident Sampling

This item will be delayed by the licensee and will be completed by June 1, 1983. The installation delay has been caused by prolonged equipment procurement and delivery schedules and by continuing difficulty in establishing and maintaining required systems availability for periods of time sufficient to complete various tie-ins. The licensee also anticipates substantial test and checkout before the system can be declared operational. The licensee has implemented interim compensatory measures.

II.F.1 (1-6) Post-Accident Monitoring (6 Items)

The licensee will delay two Items, II.F.1.1, and II.F.1.2, until June 1, 1983, one Item, II.F.1.5, until eight months after start of Cycle 5 (April 1983), and one Item, II.F.1.6, until the first outage of sufficient duration, but not later than prior to the start of Cycle 6. The licensee asserts that two Items, II.F.1.3 and II.F.1.4, are complete. With respect to Items II.F.1.1 and II.F.1.2, the licensee has experienced significant delays in the development, procurement and delivery of the isokinetic sample probes and in the procurement and delivery of the needed cabling. In addition, certain aspects of the installation will require concurrent outages of both Units 1 and 2. The licensee intends to perform this specific aspect during a brief dual-unit outage during the 1982 fall refueling outage on Brunswick Unit 1. However, should that not prove to be feasible, the licensee will in any event, complete Items II.F.1.1 and II.F.1.2 on both units prior to June 1, 1983. Late delivery of qualified instrumentation valves and manifolds precluded completion of

Item II.F.1.5 during the recent Brunswick Unit 2 outage. It will, however, be complete within eight months after the start of Cycle 5 (May 1983). The installation schedule for Item II.F.1.6 is significantly longer than the schedule for the 1982 refueling outage, with no possibility of reducing the installation time. Thus, the licensee is deferring installation until the first outage of sufficient duration, but no later than prior to the start of Cycle 6 (3/84). In the interim the licensee will continue to use the existing hydrogen and oxygen monitors.

II.K.3.18 ADS Actuation

The BWR Owners Group generic submittal was made on October 29, 1982. The licensee is assessing the applicability of that submittal to the facility and will provide a plant-unique submittal by February 28, 1983.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the delays; and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

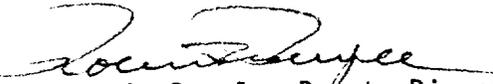
V.

The licensee may request a hearing on this Order within .20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14th day of March 1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions	Complete
II.B.3	Post-Accident Sampling	1/1/82	Install upgraded post-accident sampling capability	6/1/83
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation	Complete
		7/1/81	Part 7-isolate purge* & vent valves on radiation signal	Technical Exception
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors	6/1/83
		1/1/82	(2) Provide capability for effluent monitoring of iodine	6/1/83
		1/1/82	(3) Install incon-tainment radiation-level monitors	Complete

*Not Part of Confirmatory Order

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
II.F.1		1/1/82	(4) Provide continuous indication of containment pressure	Complete
		1/1/82	(5) Provide continuous indication of containment water level	Eight months after start of Cycle 5 (5/83)
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment	First outage of sufficient duration, but no later than prior to the start of Cycle 6
II.K.3.15	Isolation of HPCI & RCIC Modification	7/1/81	Modify pipe break detection logic to prevent inadvertent isolation	Complete
II.K.3.22	RCIC Suction	1/1/82	Modify design of RCIC suction to provide automatic transfer to torus	Complete
II.K.3.24	Space Cooling for HPCI/RCIC	1/1/82	Confirm the adequacy of space cooling for HPCI/RCIC	Complete
II.K.3.27	Common reference level	7/1/81	Provide common reference level for vessel level instrumentation	Complete

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd 6/15/82	Complete
I.A.1.3.2	Minimum Shift* Crew	To be superseded by Proposed Rule	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units	To be addressed when Final Rule is issued
I.C.1	Revise Emergency* Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test	7/1/81	Submit plant specific reports on relief and safety valve program	Complete
II.K.3.18	ADS Actuation	9/30/82	Submit revised position on need for modifications	2/28/83
II.K.3.30 & 31	SBLOCA Analysis*	1 yr. after staff approval of model	Submit plant specific analyses	To be determined following staff approval of model
III.A.1.2	Staffing Levels* for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined

*Not Part of Confirmatory Order

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737	Requirement	Licensee's Completion Schedule (or status)
III.A.1.2	Upgrade Emergency Support Facilities*	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
III.A.2.2	Meteorological Data*	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
III.D.3.4	Control Room Habitability	To be Determined by licensee	Modify facility as identified by licensee study	Complete

*Not Part of Confirmatory Order