

February 22, 1995

DISTRIBUTION

Mr. D. L. Farrar
Manager, Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

Docket File PUBLIC
PDIII-2 r/f EAdensam
RCapra CMoore
JStang OGC
GHill(4) CGrimes
ACRS(4) OPA
OC/LFDCB PHiland, RIII

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M84321 AND M84322)

Dear Mr. Farrar:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 132 to Facility Operating License No. DPR-19 and Amendment No. 126 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3. The amendments are in response to your application dated July 29, 1992, as supplemented January 14, 1993, February 16, 1993, and January 27, 1995.

The July 29, 1992, application, is one of twelve applications which have been submitted by Commonwealth Edison Company (ComEd) in an effort to upgrade the existing custom Technical Specifications (TS) to the Boiling Water Reactor (BWR) Standard Technical Specifications (STS). Dresden has recently rescheduled the Unit 2 refueling outage from March 4, 1995, until June 1995. Currently, the surveillance frequency for certain Inservice Testing (IST) requirements expires on February 21, 1995. The current TSs do not make provisions for a grace period for surveillance frequencies of the IST program. In accordance with BWR STS guidance, the TSs regarding IST proposed in the July 29, 1992, application, allow the flexibility to perform these tests appropriately during refueling outages (where applicable) by providing a 25 percent extension to IST surveillance intervals. The January 27, 1995, supplement requests the staff to review and approve just that portion of July 29, 1992, application dealing with the implementation of the IST program in Section 3.0/4.0 of the proposed TS.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

original signed by
John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

9502270320 950222
PDR ADOCK 05000237
P PDR

Docket Nos. 50-237 and 50-249

- Enclosures: 1. Amendment No. 132 to DPR-19
2. Amendment No. 126 to DPR-25
3. Safety Evaluation

cc w/encls: see next page

NO COPY OF THIS DOCUMENT
CPI

DOCUMENT NAME: DRESDEN\DR84321.AMD

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	LA:PD/III-2	PM:PD/III-2	D:PD/III-2	E	OGC		
NAME	CMOORE	JSTANG:jar	RCAPRA	Boe	CMoore		
DATE	02/24/95	02/21/95	02/21/95		02/24/95	02/21/95	

OFFICIAL RECORD COPY

240110

DF011



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 22, 1995

Mr. D. L. Farrar
Manager, Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M84321 AND M84322)

Dear Mr. Farrar:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 132 to Facility Operating License No. DPR-19 and Amendment No. 126 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3. The amendments are in response to your application dated July 29, 1992, as supplemented January 14, 1993, February 16, 1993, and January 27, 1995.

The July 29, 1992, application, is one of twelve applications which have been submitted by Commonwealth Edison Company (ComEd) in an effort to upgrade the existing custom Technical Specifications (TS) to the Boiling Water Reactor (BWR) Standard Technical Specifications (STS). Dresden has recently rescheduled the Unit 2 refueling outage from March 4, 1995, until June 1995. Currently, the surveillance frequency for certain Inservice Testing (IST) requirements expires on February 21, 1995. The current TSs do not make provisions for a grace period for surveillance frequencies of the IST program. In accordance with BWR STS guidance, the TSs regarding IST proposed in the July 29, 1992, application, allow the flexibility to perform these tests appropriately during refueling outages (where applicable) by providing a 25 percent extension to IST surveillance intervals. The January 27, 1995, supplement requests the staff to review and approve just that portion of July 29, 1992, application dealing with the implementation of the IST program in Section 3.0/4.0 of the proposed TS.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Stang".

John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 132 to DPR-19
2. Amendment No. 126 to DPR-25
3. Safety Evaluation

cc w/encls: see next page

D. L. Farrar
Commonwealth Edison Company

Dresden Nuclear Power Station
Unit Nos. 2 and 3

cc:

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60690

Mr. Thomas P. Joyce
Site Vice President
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Mr. J. Eenigenburg
Station Manager, Unit 2
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Mr. D. Bax
Station Manager, Unit 3
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
6500 North Dresden Road
Morris, Illinois 60450-9766

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Chairman
Grundy County Board
Administration Building
1320 Union Street
Morris, Illinois 60450



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 132
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Commonwealth Edison Company (the licensee) dated July 29, 1992, as supplemented January 14, 1993, February 16, 1993, and January 27, 1995, 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;
 - 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.
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. DPR-19 is hereby amended to read as follows:

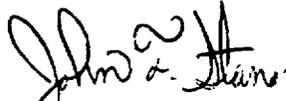
9502270324 950222
PDR ADOCK 05000237
P PDR

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 132, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 22, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 132

FACILITY OPERATING LICENSE NO. DPR-19

DOCKET NO. 50-237

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

<u>REMOVE</u>	<u>INSERT</u>
3.0-2	3.0-2
-	3.0-2a
B 3.0-3	B 3.0-3

3.0 LIMITING CONDITION FOR OPERATION
(cont'd).

hot shutdown within 12 hours, and in at least cold shutdown within the following 24 hours.

- C. Specifications 3.0.A and 3.0.B are not applicable in refueling or cold shutdown.
- D. Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
 - 1. Inservice Inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g) and 50.55a(f), respectively, except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i) or 50.55a(f)(6)(i), respectively.
 - 2. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

3.0 LIMITING CONDITION FOR OPERATION (cont'd).

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities	Required Frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

3. The provisions of Specification 1.0.CC.a are applicable to the above required frequencies for performing inservice inspection and testing activities.
4. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
5. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.
6. The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in Generic Letter 88-01 or in accordance with alternate measures approved by the NRC staff.

3.0 LIMITING CONDITION FOR OPERATION BASES

3.0.A. This specification delineates the action to be taken for circumstances not directly provided for in the Limiting Condition for Operation statements and whose occurrence would violate the intent of the specification.

3.0.B. This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the Limiting Condition for Operation statements for power sources, when a normal or emergency power source is not operable. Power sources are defined as AC Auxiliary Electrical Systems as defined in Section 3.9.A.1, 3.9.A.2, and 3.9.A.3. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the Limiting Condition for Operation Statements associated with individual systems, subsystems, trains, components or devices to be consistent with the Limiting Condition for Operation statements of the associated electrical power source. It allows operation to be governed by the time limits of action statements associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual action statements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

3.0.C N/A

3.0.D Specification 3.0.D establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 126
License No. DPR-25

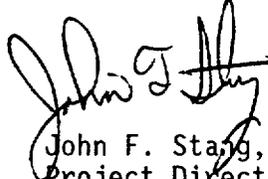
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Commonwealth Edison Company (the licensee) dated July 29, 1992, as supplemented January 14, 1993, February 16, 1993, and January 27, 1995, complies with the standards and requirements of the 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;
 - 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.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 126, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 22, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 126

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

<u>REMOVE</u>	<u>INSERT</u>
3.0-2	3.0-2
-	3.0-2a
B 3.0-3	B 3.0-3

3.0 LIMITING CONDITION FOR OPERATION
(cont'd).

hot shutdown within 12 hours, and in at least cold shutdown within the following 24 hours.

- C. Specifications 3.0.A and 3.0.B are not applicable in refueling or cold shutdown.
- D. Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:
 - 1. Inservice Inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g) and 50.55a(f), respectively, except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i) or 50.55a(f)(6)(i), respectively.
 - 2. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

3.0 LIMITING CONDITION FOR OPERATION (cont'd).

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities	Required Frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

3. The provisions of Specification 1.0.CC.a are applicable to the above required frequencies for performing inservice inspection and testing activities.
4. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
5. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.
6. The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in Generic Letter 88-01 or in accordance with alternate measures approved by the NRC staff.

3.0 LIMITING CONDITION FOR OPERATION BASES

3.0.A. This specification delineates the action to be taken for circumstances not directly provided for in the Limiting Condition for Operation statements and whose occurrence would violate the intent of the specification.

3.0.B. This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the Limiting Condition for Operation statements for power sources, when a normal or emergency power source is not operable. Power sources are defined as AC Auxiliary Electrical Systems as defined in Section 3.9.A.1, 3.9.A.2, and 3.9.A.3. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the Limiting Condition for Operation Statements associated with individual systems, subsystems, trains, components or devices to be consistent with the Limiting Condition for Operation statements of the associated electrical power source. It allows operation to be governed by the time limits of action statements associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual action statements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

3.0.C. N/A

3.0.D. Specification 3.0.D establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 132 TO FACILITY OPERATING LICENSE NO. DPR-19
AND AMENDMENT NO. 126 TO FACILITY OPERATING LICENSE NO. DPR-25

COMMONWEALTH EDISON COMPANY

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By letter dated July 29, 1992, as supplemented January 14, 1993, and February 16, 1993, Commonwealth Edison Company (ComEd, the licensee) proposed to upgrade the existing custom Technical Specifications (TS) to the Boiling Water Reactor (BWR) Standard Technical Specifications (STS). Dresden has recently rescheduled the Unit 2 refueling outage from March 4, 1995, until June 1995. Currently, the surveillance frequency for certain Inservice Testing (IST) requirements expires on February 21, 1995. The existing current TSs do not make provisions for a grace period for surveillance frequencies of the IST program. In accordance with BWR STS guidance, the TSs regarding IST proposed in the July 29, 1992, application, allow the flexibility to perform these tests appropriately during refueling outages (where applicable) by providing a 25 percent extension to IST surveillance intervals. By letter dated January 27, 1995, ComEd requested the staff to review and approve just that portion of the July 29, 1992, application, dealing with the implementation of the IST program in Section 3.0/4.0 of the proposed TSs. This supplement was requested solely to prevent a violation of the requirements of 10 CFR 50.55a and did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The proposed TSs as clarified in the January 27, 1995, supplement, upgrade the current TSs (which do not reference the IST program) by adopting the STS guidelines referencing the requirements of 10 CFR 50.55a concerning the IST program. Specifically, the proposed TSs refer to the implementation of the IST program per the requirements of 10 CFR 50.55a. The proposed TSs mandate compliance with 10 CFR 50.55a, the requirements of the IST program, except when relief has been provided in writing by the Commission. The proposed TSs provide clarification of the frequencies for performing IST activities required by 10 CFR 50.55a which incorporates, by reference, the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code). The clarification provided by the proposed TSs ensures consistency in the surveillance intervals throughout the TSs and eliminates any ambiguities relative to performing the tests required by

Section XI of the ASME Code. The proposed TSs include a provision allowing a 25 percent extension for the IST required test frequencies. The proposed 25 percent surveillance extension allows a required surveillance to be extended up to 25 percent of the required surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend IST surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that refueling outage surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of 25 percent is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. The proposed provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval. The proposed TS is consistent with the guidelines of the BWR-4 STS and the BWR Improved Standard Technical Specifications contained in NUREG-1433, "Improved BWR-4 Technical Specifications." The proposed changes provide clarification of the implementation of the IST program and how it affects the other required surveillances in the Dresden, Units 2 and 3, TSs. The proposed TS change does not adversely affect the safe operation of Dresden, Units 2 and 3. The proposed amendment clarifies the requirements of the IST program and its implementation at Dresden. Based on the above, the staff finds the proposed changes to the TSs are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a surveillance requirement. The NRC staff has determined that the amendments involve 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 amendments involve no significant hazards consideration, and there has been no public comment on such finding (58 FR 34071). Accordingly, the amendments meet 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 amendments.

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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Stang

Date: February 22, 1995