November 21, 1985

Docket No. 50-298

Mr. J. M. Pilant, Technical
Staff Manager
Nuclear Power Group
Nebraska Public Power District
Post Office Box 499
Columbus, Nebraska 68601

Dear Mr. Pilant:

The Commission has issued the enclosed Amendment No. 95 to Facility Operating License No. DPR-46 for the Cooper Nuclear Station. This amendment consists of changes to the Technical Specifications in response to your application dated May 15, 1985, as supplemented July 11, 1985.

The amendment revises the Technical Specifications to reduce the frequency of diesel generator surveillance testing in accordance with the recommendations of Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability." The amendment also increases the load to be applied to the diesel generators during monthly operability testing and makes the standby gas treatment system nomenclature consistent.

A copy of the Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Ernest D. Sylvester, Project Manager
Operating Reactors Branch #2
Division of Licensing

Enclosures:
1. Amendment No. 95 to License No. DPR-46
2. Safety Evaluation

cc w/enclosures:
See next page

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

NEBRASKA PUBLIC POWER DISTRICT

DOCKET NO. 50-298

COOPER NUCLEAR STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 95
License No. DPR-46

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

   A. The application for amendment by Nebraska Public Power District dated May 15, 1985, as supplemented by submittal dated July 11, 1985, 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 licensee 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-46 is hereby amended to read as follows:

(2) Technical Specification

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 95, 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 its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 21, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 95

FACILITY OPERATING LICENSE NO. DPR-46

DOCKET NO. 50-298

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Pages
115
116
117
120
125
165a
193
199

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.A (cont'd.)	4.5.A (cont'd.)
2. From and after the date that one of the core spray subsystems is made or found to be inoperable for any reason, continued reactor operation is permissible during the succeeding seven days provided that during such seven days all active components of the other core spray subsystem and active components of the LPCI subsystem and the diesel generators are operable.	2. When it is determined that one core spray subsystem is inoperable, the operable core spray subsystem and the LPCI subsystem shall be demonstrated to be operable immediately. The operable core spray subsystem shall be demonstrated to be operable daily thereafter.
3. Both LPCI subsystems shall be operable: (1) prior to reactor startup from a Cold Condition, except as specified in 3.5.F.7, or (2) when there is irradiated fuel in the vessel and when the reactor vessel pressure is greater than atmospheric pressure, except as specified in 3.5.A.4 and 3.5.A.5 below.	3. LPCI subsystem testing shall be as follows: a. Simulated Automatic Actuation Test — Once/Operating Cycle b. Pump Operability — Once/month c. Motor Operated Valve Operability — Once/month d. Pump Flow Rate — Once/3 months During single pump LPCI, each RHR pump shall deliver at least 7700 GPM but no more than 8400 GPM against a system head equivalent to a reactor vessel pressure of 20 psid above drywell pressure with water level below the jet pumps. At the same conditions, two pump LPCI flow shall be at least 15,000 GPM. e. Recirculation pump discharge valves shall be tested each refueling outage to verify full open to full closed in $20 \leq t \leq 26$ seconds.
4. From and after the date that one of the RHR (LPCI) pumps is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding thirty days provided that during such thirty days the remaining active components of the LPCI subsystem and all active components of both core spray subsystems and the diesel generators are operable.	4. When it is determined that one of the RHR (LPCI) pumps is inoperable at a time when it is required to be operating the remaining active components of the LPCI subsystems, the containment cooling subsystem and both core spray systems shall be demonstrated to be operable immediately and the operable LPCI pumps daily thereafter.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.A (Cont'd.)	4.5.A. (Cont'd.)
5. From and after the date that one LPCI subsystem is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding 7 days, unless it is sooner made operable, provided that during such 7 days all active components of both core spray subsystems, the containment cooling subsystems (including 2 LPCI pumps) and the diesel generators required for operation of such components shall be operable.	5. When it is determined that the LPCI subsystem is inoperable, both core spray subsystems and the containment cooling subsystem shall be demonstrated to be operable immediately and daily thereafter.
6. All recirculation pump discharge valves and bypass valves shall be operable prior to reactor startup (or closed if permitted elsewhere in these specifications).	6. **All recirculation pump discharge valves shall be tested for operability during any period of Reactor cold shutdown exceeding 48 hours, if operability tests have not been performed during the preceding 31 days.**
7. The reactor shall not be started up with the RHR system supplying cooling to the fuel pool.	
8. If the requirements of 3.5.A 1,2,3,4, 5,6 or 7 cannot be met, an orderly shutdown of the reactor shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.	
B. Containment Cooling Subsystem (RHR Service Water)	B. Containment Cooling Subsystem (RHR Service Water)
1. Except as specified in 3.5.B.2, 3.5.B.3, and 3.5.F.3 below both containment cooling subsystems loops shall be operable whenever irradiated fuel is in the reactor vessel and reactor coolant temperature is greater than 212°F, and prior to reactor startup from a Cold Condition.	1. Containment Cooling Subsystem Testing shall be as follows:

	Item	Frequency
a.	Pump & Valve Operability	Once/3 months
b.	Pump Capacity Test. Each RHR service water booster pump shall deliver 4000 gpm.	After pump maintenance and every 3 months
c.	Air test on drywell and torus headers and nozzles.	Once/5 years

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.B (Cont'd.)	4.5.B (Cont'd.)
2. From and after the date that any RHR service water booster pump is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding thirty days, unless such pump is sooner made operable provided that during such thirty days all other active components of the containment cooling subsystem are operable.	2. When it is determined that any RHR service water booster pump is inoperable, the remaining active components of the containment cooling subsystems shall be demonstrated to be operable immediately and weekly thereafter.
3. From and after the date that one containment cooling subsystem loop is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding seven days unless such subsystem loop is sooner made operable, provided that all active components of the other containment cooling subsystem loop, including its associated diesel generator, are operable.	3. When one containment cooling subsystem loop becomes inoperable, the operable subsystem loop shall be demonstrated to be operable immediately and daily thereafter.
4. If the requirements of 3.5.B.1, 3.5.B.2 or 3.5.B.3 cannot be met, an orderly shutdown shall be initiated and the reactor shell be in a cold shutdown condition within 24 hours.	
C. HPCI Subsystem	C. HPCI Subsystem
1. The HPCI Subsystem shall be operable whenever there is irradiated fuel in the reactor vessel, reactor pressure is greater than 113 psig, and prior to reactor startup from a Cold Condition, except as specified in 3.5.C.2 and 3.5.C.3 below.	1. HPCI subsystem testing shall be performed as follows:

	Item	Frequency
a.	Simulated Automatic Actuation Test	Once/operating Cycle
b.	Pump Operability	Once/month
c.	Motor Operated Valve Operability	Once/month

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.E (cont'd)	4.5.E (cont'd)
2. From and after the date that one valve in the automatic depressurization subsystem is made or found to be inoperable for any reason, continued reactor operation is permissible only during the succeeding seven days unless such valve is sooner made operable, provided that during such seven days the HPCI subsystem is operable.	2. When it is determined that one valve of the ADS is inoperable, the ADS subsystem actuation logic for the other ADS valves and the HPCI subsystem shall be demonstrated to be operable immediately and at least weekly thereafter.
3. With the surveillance requirements of 4.6.D.5 not performed at the required intervals due to reactor shutdown, a reactor startup may be conducted provided the appropriate surveillance is performed within 12 hours of achieving 113 psig reactor steam pressure.	
4. If the requirements of 3.5.E.1 or 3.5.E.2 cannot be met, an orderly shutdown shall be initiated and the reactor pressure shall be reduced to at least 113 psig within 24 hours.	
F. Minimum Low Pressure Cooling and Diesel Generator Availability	F. Minimum Low Pressure Cooling and Diesel Generator Availability
1. During any period when one diesel generator is inoperable, continued reactor operation is permissible only during the succeeding seven days unless such diesel generator is sooner made operable, provided that all of the low pressure core and containment cooling subsystems and the remaining diesel generator shall be operable and the requirements of 3.9.A.1 are met. If this requirement cannot be met, the requirements of 3.5.F.2 shall be met.	1. When it is determined that one diesel generator is inoperable, all low pressure core cooling and containment cooling subsystems shall be demonstrated to be operable immediately and daily thereafter. In addition, the operable diesel generator shall be demonstrated to be operable immediately and every three days thereafter.
2. During any period when both diesel generators are inoperable, continued reactor operation is permissible only during the succeeding 24 hours unless one diesel generator is sooner made operable, provided that all the low pressure core and containment cooling subsystems are operable and the reactor power level is reduced to 25% of rated power and the requirements of 3.9.A.1 are met. If this requirement cannot be met, either the requirements shall be met or an orderly shutdown shall be initiated and the reactor placed in the cold shutdown condition within 24 hours.	

3.5.A BASES (cont'd.)

core spray subsystems and LPCI constitute a 1 out of 3 system; however, the combined effect of the two systems to limit excessive clad temperatures must also be considered. The test interval specified in Specification 4.5 is 1 month. Should a subsystem fail, a daily test is called for on the remaining systems to ensure that they will function.

Should one core spray subsystem become inoperable, the remaining core spray and the LPCI system are available should the need for core cooling arise. To assure that the remaining core spray and LPCI subsystems are available, they are demonstrated to be operable immediately. This demonstration includes a manual initiation of the pumps and associated valves.

Should the loss of one LPCI pump occur, a nearly full complement of core and containment cooling equipment is available. Three LPCI pumps in conjunction with the core spray subsystem will perform the core cooling function. Because of the availability of the majority of the core cooling equipment, which will be demonstrated to be operable, a thirty day repair period is justified. If the LPCI subsystem is not available, at least 1 LPCI pump must be available to fulfill the containment cooling function. The 7 day repair period is set on this basis.

B. Containment Cooling Subsystem

The containment cooling subsystem for CNS consists of two loops each with 2 RHR (LPCI) pumps serving one side of the RHR heat exchanger and two RHR Service Water Booster Pumps serving the other side. The design of the loops is predicted upon the use of one RHR Service Water Booster Pump and one RHR heat exchanger, for heat removal after a design basis accident. Thus, there are ample spares for margin above design conditions. Loss of margin should be avoided and the equipment maintained in a state of operation. So a 30 day out-of-service time is chosen for this equipment. If one loop is out-of-service reactor operation is permissible for seven days with daily testing of the operable loop.

With components or subsystems out-of-service, overall core and containment cooling reliability is maintained by demonstrating the operability of the remaining cooling equipment. The degree of operability to be demonstrated depends on the nature of the reason for the out-of-service equipment. For routine out-of-service periods caused by preventive maintenance, etc., the pump and valve operability checks will be performed to demonstrate operability of the remaining components. However, if a failure, design deficiency, etc., caused the out-of-service period, then the demonstration of operability should be thorough enough to assure that a similar problem does not exist on the remaining components. For example, if an out-of-service period were caused by failure of a pump to deliver rated capacity, the other pumps of this type might be subjected to a capacity test. In any event, surveillance procedures, as required by Section 6 of these specifications, detail the required extent of testing.

The pump capacity test is a comparison of measured pump performance parameters

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.7.B (cont'd)	4.7.B (cont'd)
4. If these conditions cannot be met, procedures shall be initiated immediately to establish reactor conditions for which the standby gas treatment system is not required.	4.a. At least once per operating cycle automatic initiation of each branch of the standby gas treatment system shall be demonstrated.
	b. At least once per operating cycle manual operability of the bypass valve for filter cooling shall be demonstrated.
	c. When one standby gas treatment system becomes inoperable the other standby gas treatment system shall be demonstrated to be operable immediately and daily thereafter. A demonstration of diesel generator operability is not required by this specification.
C. Secondary Containment	C. Secondary Containment
1. Secondary containment integrity shall be maintained during all modes of plant operation except when all of the following conditions are met.	1. Secondary containment surveillance shall be performed as indicated below:

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.9 AUXILIARY ELECTRICAL SYSTEM	4.9 AUXILIARY ELECTRICAL SYSTEM
Applicability:	Applicability:
Applies to the auxiliary electrical power system.	Applies to the periodic testing requirements of the auxiliary electrical systems.
Objective:	Objective:
To assure an adequate supply of electrical power for operation of those systems required for safety.	Verify the operability of the auxiliary electrical system.
Specification:	Specification:
A. Auxiliary Electrical Equipment	A. Auxiliary Electrical Equipment
1. The reactor shall not be made critical from a Cold Shutdown Condition unless all of the following conditions are satisfied:	1. Emergency Buses Undervoltage Relays
a. Both off-site sources (345 KV and 69 KV) and the startup transformer and emergency transformer are available and capable of automatically supplying power to the 4160 Volt emergency buses 1F and 1G.	a. Loss of voltage relays Once every 18 months, loss of voltage on emergency buses is simulated to demonstrate the load shedding from emergency buses and the automatic start of diesel generators.
b. Both diesel generators shall be operable and there shall be a minimum of 45,000 gal. of diesel fuel in the fuel oil storage tanks.	b. Undervoltage relays Once every 18 months, low voltage on emergency buses is simulated to demonstrate disconnection of the emergency buses from the offsite power source. The undervoltage relays shall be calibrated once every 18 months.
c. The 4160V critical buses 1F and 1G and the 480V critical buses 1F and 1G are energized. 1. The loss of voltage relays and their auxiliary relays are operable. 2. The undervoltage relays and their auxiliary relays are operable.	2. Diesel Generators a. Each diesel-generator shall be started manually and loaded to not less than 50% of rated load for no less than 2 hours once each month to demonstrate operational readiness.
d. The four unit 125V/250V batteries and their chargers shall be operable.	
e. The power monitoring system for the inservice RPS MG set or alternate source shall be operable.	

4.9 BASES

The monthly test of the diesel generator is conducted to check for equipment failures and deterioration. Testing is conducted up to equilibrium operating conditions to demonstrate proper operation at these conditions. The diesel generator will be manually started, synchronized and connected to the bus and load picked up. The diesel generator should be loaded to at least 50% of rated load to prevent fouling of the engine. It is expected that the diesel generator will be run for at least two hours. Diesel generator experience at other generating stations indicates that the testing frequency is adequate and provides a high reliability of operation should the system be required.

Each diesel generator has two air compressors and two air receivers for starting. It is expected that the air compressors will run only infrequently. During the monthly check of the diesel generator, each receiver in each set of receivers will be drawn down below the point at which the corresponding compressor automatically starts to check operation and the ability of the compressors to recharge the receivers.

The diesel generator fuel consumption rate at full load is approximately 275 gallons per hour. Thus, the monthly load test of the diesel generators will test the operation and the ability of the fuel oil transfer pumps to refill the day tank and will check the operation of these pumps from the emergency source.

The test of the diesel generator during the refueling outage will be more comprehensive in that it will functionally test the system; i.e, it will check diesel generator starting and closure of diesel generator breaker and sequencing of load on the diesel generator. The diesel generator will be started by simulation of a loss-of-coolant accident. In addition, an undervoltage condition will be imposed to simulate a loss of off-site power.

Periodic tests between refueling outages verify the ability of the diesel generator to run at full load and the core and containment cooling pumps to deliver full flow. Periodic testing of the various components, plus a functional test once-a-cycle, is sufficient to maintain adequate reliability.

Although station batteries will deteriorate with time, utility experience indicates there is almost no possibility of precipitous failure. The type of surveillance described in this specification is that which has been demonstrated over the years to provide an indication of a cell becoming irregular or unserviceable long before it becomes a failure. In addition, the checks described also provide adequate indication that the batteries have the specified ampere-hour capability.

The diesel fuel oil quality must be checked to ensure proper operation of the diesel generators. Water content should be minimized because water in the fuel could contribute to excessive damage to the diesel engine.

When it is determined that some auxiliary electrical equipment is out of service, the increased surveillance required in Section 4.5.F is deemed adequate to provide assurance that the remaining equipment will be operable.

The Reactor Protection System (RPS) is equipped with a seismically qualified, Class 1E power monitoring system. This system consists of eight Electrical Protection Assemblies (EPA) which isolate the power sources from the RPS if the input voltage and frequency are not within limits specified for safe system operation. Isolation of RPS power causes that RPS division to fail safe.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 95 TO FACILITY OPERATING LICENSE NO. DPR-46

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1.0 INTRODUCTION

This amendment modifies the Cooper Nuclear Station Technical Specifications as follows:

(1) The requirement for diesel generator testing when emergency core cooling system (ECCS) components are found to be inoperable is deleted and the diesel generator testing requirement relative to standby gas treatment system (SGTS) operability is clarified.

(2) The load to be applied to the diesel generators during monthly operability testing is increased.

(3) The diesel generator test frequency when the other diesel generator is inoperable is decreased.

(4) The terminology applied to the SGTS is made consistent.

These Technical Specification changes were proposed by the Nebraska Public Power District, the licensee for Cooper Nuclear Station in a letter dated May 15, 1985 as supplemented by a letter dated July 11, 1985.

2.0 EVALUATION

2.1 Diesel Generator Testing - ECCS and SGTS Operability

The emergency diesel generator (EDG) is one of the main factors affecting the risk from station blackout and thus an improvement in EDG reliability can reduce the risk of core damage from station blackout events. The staff has concluded that excessive testing results in degradation of diesel engines. The staff is concerned with the number of additional EDG tests required for the earlier licensed operating plants by their current Technical Specifications while no such requirement exists for the recently licensed plants under the Standard Technical Specifications (STS). In an effort to reduce excessive testing of EDGs in these earlier plants and make their Technical Specifications comparable with that of the STS Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability recommended that the requirement for testing EDGs in

conjunction with inoperability of emergency core cooling systems (ECCS) be deleted from plant unique requirements and the affected licensees were invited to submit Technical Specifications to make such changes.

Accordingly, by letter dated May 15, 1985, the Nebraska Public Power District (NPPD) proposed to delete Cooper Nuclear Station Technical Specification requirements for EDG testing when it is found that a core spray subsystem, residual heat removal pump, low pressure coolant injection subsystem, or containment cooling subsystem is inoperable. The Bases sections for the core spray and containment spray system would also be modified to reflect the above proposed changes. In addition, although the licensee is not currently required to perform testing to determine EDG operability when one SGTS is found to be inoperable, NPPD has proposed to change the SGTS surveillance requirements to make it clear that the EDG test is not required.

We have reviewed the above proposed changes and find the changes consistent with the intent of staff actions in Generic Letter 84-15 to improve and maintain EDG reliability by reducing EDG testing. Therefore, we conclude that these Technical Specification changes are acceptable.

2.2 Diesel Generator Test Load

In order to enhance EDG reliability, NPPD has proposed a Technical Specification change to increase the minimum percent of rated load from 35 percent to 50 percent during its 2 hour monthly surveillance test. The licensee contends that the increased load will help prevent fouling of the diesel engine and conforms with Regulatory Guide 1.108, Section C.2.e.(3).

Our EDG experience with the other operating plants has shown that diesel operation at no-load or light-loads (less than 25%) has been shown to be detrimental to the engine internals. Also, most diesel engine manufacturers recommend that every EDG start be followed by at least 60 minutes at least 60% load. We concur with the licensee's assessment on the DG loading and find that the proposed change to Technical Specification section 4.9.A.2.a and Bases (4.9) are acceptable.

2.3 Diesel Generator Testing - One Diesel Generator Inoperable

The licensee has proposed to reduce the number of required EDG tests when one EDG is determined to be inoperable. Currently, the Cooper Nuclear Station Technical Specifications require an EDG to be tested immediately and daily thereafter when the other EDG is determined to be inoperable. By letter dated May 15, 1985, NPPD proposed to retain the requirement for an immediate test but delete the requirement for subsequent daily test starts. By letter dated July 11, 1985, NPPD submitted a revision to the May 15, 1985 proposal which would retain the requirement for an immediate EDG test with subsequent tests every 3 days thereafter.

We have reviewed the proposed changes and find that the licensee's July 11, 1985 submittal is similar to a previously approved amendment application submitted for North Anna 2. Based on our review for North Anna 2 we found acceptable the 3 day test frequency which also coincides with the Standard Technical Specification limiting condition for operation with one EDG Inoperable. We conclude that the proposed Technical Specification change with a 3 day test frequency is adequate to verify EDG operability and is consistent with what was approved for North Anna 2, and is, therefore, acceptable.

2.4 Standby Gas Treatment System (SGTS) Nomenclature

The licensee has proposed to change Section 4.7.B.4.c of the Technical Specifications to make this section consistent with other sections with regard to SGTS nomenclature. The amendment would change the word "circuit" to "standby gas treatment system" when referring to each of the redundant standby gas treatment equipment safety divisions.

We have reviewed the proposed change and find that the change is purely administrative. We conclude that the Technical Specifications change to SGTS nomenclature is acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this 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 this amendment.

4.0 CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: P. Kang and E. Sylvester

Dated: November 21, 1985