

PRELIMINARY NOTIFICATIONS

1120-01 PURPOSE

To provide instructions regarding the prompt dissemination of information about significant events occurring at facilities or relating to activities licensed by the Nuclear Regulatory Commission (NRC) or an Agreement State.

1120-02 OBJECTIVES

The objectives of the oral and written preliminary notification (PN) system are as follows:

- a. To promptly provide the Commission, and other NRC and Agreement State management, new and current information on matters that are of significant safety or safeguards concern, or have, or potentially could have, high public interest.
- b. To provide information to the NRC and Agreement States, on a less urgent basis, regarding matters that are the subject of PNs.

1120-03 POLICY

02.01 Implementation. Oral and/or written PNs will be made for all matters that meet the criteria specified in this manual chapter (see Sections 1120-07 and -08). To avoid duplication of reports, PNs should normally address the more significant events that warrant immediate attention of upper management and should supplement existing event reports. When an Event Notification (EN) has been issued to document a report to the Headquarters Operations Center, a PN will not be issued to report the same information.

02.02 Issuing office. A written PN will be issued by the NRC regional or headquarters (HQ) office that received information about an event. Regional offices usually will have jurisdiction over the issuance of PNs for events occurring in the regions, including events that are first reported to the Headquarters Operations Officer. The text of the PN will be created using **Microsoft Word** or other available software (see ADAMS Desk Reference Guide for acceptable software). The issuing office will place the PN in ADAMS in a pre-determined subdirectory. They will also provide the document information to the Document Processing Center, in the Office of Information Services (OIS) via electronic distribution, for secondary processing. The issuing office will be responsible for electronic dissemination of the PN using the distribution list provided by OIS.

1120-04 DEFINITIONS

Oral and Written Preliminary Notification (PN). An early notice of an event **or issue** of possible safety or safeguards significance, **generic interest**, or high public interest. The information presented is as initially received without complete verification or evaluation, and is essentially all that is known at the time notification is made. Oral notification during a conference call is also known as a Commissioners' Assistants Briefing, and is always followed up with a written PN.

1120-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Regional Administrators or Designees

- a. Evaluate data received in the regional office to determine if the criteria for oral and/or written PNs have been met.
- b. Assure that during normal duty hours adequate consultation is made with the appropriate NRC HQ office regarding the need for a telephonic notification before issuing the written PN.
- c. Assure, when practical and appropriate, that the accuracy of technical information included in the written PN has been confirmed with licensee management before the PN is issued. Also, when practical and appropriate, assure that all written PNs containing information relevant to radiation exposure of licensee employees, or of the public, are reviewed for technical accuracy by regional management staff having responsibility for the radiation protection inspection program.
- d. Approve PNs prior to issuance.
- e. Assure that written PNs are promptly distributed electronically to designated offices (See Section 1120-11).
- f. Promptly inform by telephone the appropriate HQ office(s), such as the Offices of Nuclear Reactor Regulation (NRR), Nuclear Materials Safety and Safeguards (NMSS), **Federal and State Materials and Environmental Management Programs (FSME)**, Nuclear Security and Incident Response (NSIR), Public Affairs (OPA), State and Tribal Programs (STP), etc., of the most significant matters that are the subject of PNs issued by the Regional Office. When the matter has radiological significance, contact the Radiation Protection Program Office in each affected State.
- g. Make oral notification of significant matters, or assure that a conference call is established with the Headquarters Operations Officer. (See Section 1120-08)

05.02 HQ Office (NMSS, **FSME** or NRR) Directors, or Designees

- a. For those cases in which a HQ office is the issuing office, promptly inform the appropriate regional and HQ offices orally of significant matters that are the subject of PNs. When the matter has radiological significance, contact the Radiation

Protection Program Office in each affected State. Assure that the accuracy of technical information included in the written PN has been confirmed with licensee management before the PN is issued as appropriate and when practical.

- b. Prepare, approve, and promptly distribute PNs electronically that are to be issued by HQ within its programmatic areas (See Section 1120-11).
- c. When the HQ office is the most knowledgeable on a subject, provide the appropriate input to the cognizant regional office prior to its issuance of the PN.
- d. Make oral notifications of significant matters or assure that a conference call is established with the Headquarters Operations Officer (See Section 1120-08).
- e. Maintain awareness of significant matters described in PNs.
- f. Evaluate the performance of regional offices in the implementation of this inspection manual chapter.
- g. Promptly re-distribute PNs issued by regional offices, once PNs are received (See Section 1120-11).

05.03 Headquarters Operations Officer (HOO)

Sets up and conducts Commissioners' Assistants briefing, if requested.

05.04 HQ Office of Information Services (OIS)

- a. Post publicly available nonsensitive PNs to the public web site.
- b. Setup and maintain a link, via the [NRC website's](#) Electronic Reading Room, for each publicly available nonsensitive PN, to the actual publicly available PN in the ADAMS public library (PARS).
- c. Maintain PN distribution list.

1120-06 NUMBERING OF WRITTEN PRELIMINARY NOTIFICATIONS

Each written preliminary notification is designated by an alphanumeric code specifying the issuing organization (I, II, III, IV, H or IIT), the year of issuance, and the sequential number of the PN in that year. Thus, PNO-II-93-03 is the third written preliminary notification of an event or unusual occurrence issued by Region II in 1993. The designation H is for HQ and IIT is for Incident Investigation Team (NUREG-1303).

If subsequent written PNs are to be issued to update or correct a previously issued PN, the original written PN number is retained and a letter added to the end of the number to indicate the supplement. For example, PNO-IV-93-02B is the second supplement of PNO-IV-93-02.

a. Criteria for any NRC or Agreement State Licensee:

1. Events which prompt a licensee to declare an alert, site area emergency, or general emergency; and unusual events which may be of significant interest to the news media, government, or the public.
2. Serious natural occurrences and their effects, such as anticipated or actual shutdown of a power or research reactor because of drought, flooding, hurricane, or icing; assessment of the effects of earthquakes or tornadoes at or near licensed facilities, even when no major damage was done, major damage to licensed facilities resulting from natural occurrences.
3. Fires or explosions that: (1) affect safety-related equipment; (2) cause damage to nuclear power plants or other licensed facilities resulting in a shutdown for more than 2 days; or (3) would be expected to cause such a shutdown if the plant were in operation.
4. At non-reactor sites or in the field, significant events such as safety equipment failures during operations, damage to portable gauges resulting in unshielded sources, ruptured well logging sources, etc.
5. Any operational problem concerning reactivity, such as inadvertent criticality or significant abnormal flux distribution. For fuel cycle facilities, this includes any significant loss of criticality safety controls.

b. Criteria for Power Reactors:

1. Significant Operational Events, such as activation of the ECCS, abnormal depressurization, pipe breaks or leaks, malfunction of relief valves resulting in pressure transients, or failure of emergency diesel generators, which would cause or are expected to cause a plant shutdown in excess of 3 days, or which would be expected to cause such a shutdown if the plant were operating. [Note: When a PN is issued under this criterion, a supplemental PN should be considered, particularly for plant events that resulted in an NRC reactive inspection. If the significant event or equipment problem resulted in a plant shutdown, the supplemental PN should be issued as close to plant restart as possible (See Section 1120-12 for more information).]
2. Significant Operating Experience (OpE) issues: This criterion allows the NRR OpE Branch (IOEB) to communicate safety significant issues to NRC management and other stakeholders in a timely manner. These include generic issues that may eventually become subject of an NRC Generic Communication, but due to their potential safety significance should be communicated in a more timely fashion.¹

¹ The authority to issue a PN under this criterion is delegated to the Director, Division of Inspection and Regional Support.

c. Dose/Contamination Criteria:

- ~~2~~.1. Any contamination event requiring an NRC reactive inspection.
- ~~3~~.2. Occupational dose or probable occupational dose in excess of the limits in 10CFR20.1201, 20.1206, 20.1207, and 20.1208.
- ~~4~~.3. A public dose or probable public dose in excess of the limits in 10CFR20.1301.
- ~~5~~.4. Significant environmental events, such as releases immediately reportable under 10CFR20.2202 or events which violate NRC or Agreement State regulatory requirements.
- ~~6~~.5. Lost or stolen licensed material immediately reportable under 10CFR20.2201 when the material poses a significant safety hazard, generates high public interest, or involves radioisotopes and activities of concern for a radiological dispersal device (RDD). A PN is not required for lost or stolen portable moisture density gauges, gas chromatographs, static eliminators, explosive/chemical agent detectors, and other devices posing minimal safety hazard.
- ~~7~~.6. An event at an NRC or Agreement State licensed facility (including facilities issued a construction permit) that results in a serious injury to a contaminated person or a fatality. A PN is not appropriate for serious injuries involving uncontaminated persons.
- 7. Significant medical events reported under Subpart M of 10CFR35.

d. Transportation Event Criterion:

Significant transportation incidents such as those involving significantly damaged, leaking, lost Type B or fissile packages, or those involving high public interest (i.e., major highway closing, etc.).

e. Security Event Criterion:

Events of security significance directed toward or occurring within NRC or Agreement State licensed facilities or information concerning threats to licensees such as actual or apparent breaches of security systems, actual or threatened sabotage, malicious mischief or vandalism, bomb threats, arson, theft, discovery of discharge of firearms, and demonstrations resulting in arrests or violence. PNs related to security events should be appropriately marked as to their sensitivity. The distribution list for security-related PNs should be modified to ensure that only recipients with a need to know are included.

f. Inventory Event and Inventory Difference (ID) Criteria:

- ~~8~~-1. For licensees subject to 10CFR70.51(e), ID that exceed both 300 grams of U-235 and 1.5 times the prescribed limit of error of inventory differences (LEID).
- ~~9~~-2. For licensees subject to 10CFR74.31, ID that exceed the licensee's detectable threshold value.
3. For licensees subject to 10CFR74.51, ID that exceed both 300 grams of U-235 and 3 times the standard error of inventory differences (SEID).

g. Other Miscellaneous Criteria:

- ~~10~~-1. Strikes of employees at any major licensed facility; strikes of security guards; or honoring of picket lines by these employees which result in violence or damage to the facility.
 - ~~11~~-2. Other significant events related to licensed activities in which national, state, or local news media interest already exists, or as deemed appropriate when media interest is expected but not certain, as well as updated information on events related to licensed activities that have previously attracted media attention.
3. Significant fitness-for-duty events reportable under 10CFR26.73.

It should be noted that allegations are not appropriate subjects for PNs.

1120-08 CRITERIA FOR TELEPHONE CONFERENCE CALL NOTIFICATION
(Commissioners' Assistants Briefing)

08.01 During normal duty hours only the most noteworthy events of the types listed in Section 1120-07 warrant a conference call notification. The decision to do so will usually depend on the speed with which the event is breaking compared to the time it could take to prepare and dispatch a written PN. During other than normal duty hours, the threshold for oral notifications may be somewhat lower. On occasion the information received concerns a matter that must be promptly brought to the attention of NRC upper management before a written PN can be prepared and dispatched upon resumption of normal duty hours.

08.02 The decision concerning oral notifications for events will usually be made by the responsible issuing regional administrator or HQ office director, or designees, during normal duty hours. During other than normal duty hours, the decision concerning oral notifications is made by the Emergency Officer in consultation with the cognizant Regional Duty Officer and NSIR's on-call incident response manager.

08.03 The conference call for the Commissioners' Assistants Briefing should include the following or their designees and may include others, as appropriate.

Regional Duty officer
Emergency Officer (NRR or NMSS)
Director, Office of Nuclear Reactor Regulation

Director, Office of Nuclear Security and Incident Response
Director, Nuclear Material Safety and Safeguards
Commissioners' Assistants
Executive Director for Operations
Director, Office of Public Affairs
Director, Office of Congressional Affairs
Director, Office of State and Tribal Programs
Director, Office of International Programs

1120-09 FORMAT OF WRITTEN PRELIMINARY NOTIFICATION

09.01 General. The format and content of a written PN are shown in Exhibit 1. To facilitate the preparation of a PN, and to have a consistent format for electronic transmission and ultimate processing by recipients, the issuing office will use **Microsoft Word** or other available software (see ADAMS Desk Reference Guide for acceptable software) and the ADAMS template NRC-004 (available in ADAMS ML031150184) "NRC Preliminary Notification of Occurrence (PNOs)." Each issuing office shall track and maintain their perspective numbering systems (see Section 1120-06).

09.02 Specific Parts of Preliminary Notification. The following is a description of each part of the PN:

- a. The heading "PRELIMINARY NOTIFICATION" must be included at the top of the page.
- b. Date of issuance.
- c. PN number (see Section 1120-06)
- d. An introductory, boilerplate statement must be included in all PNs as follows:

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. **Some of the information may not yet be fully verified or evaluated by the Region Staff.**
- e. Facility - Identify the facility, its location (city/state) and the licensee.
- f. Subject - Enter a brief, one-line description of the matter.
- g. Report Content - The body of the PN contains a brief factual description of the problem or event including the time and date of occurrence, and plant, buildings, areas or systems affected by the occurrence. The PN also should describe any controls, protective measures and/or plan of action employed or immediately initiated to minimize the magnitude of the event or its effects. The accuracy of technical information should be confirmed with the licensee's plant management when practical, particularly when the information was not initially obtained from the licensee plant management. PNs should avoid speculation, or should specifically identify speculative statements when their use is considered necessary.

If the problem or event is not associated with a fixed licensee facility, but involves a release of radioactive material to the environment or other situation where a member of the public may receive a radiation exposure, the situation may be complicated by the fact that the parties with whom contact is initially made may be State or local government officials, law enforcement personnel, or fire fighters, among others. In some instances, the nexus to a licensee may be unclear (e.g., transportation accident with a fire which consumes the shipping papers or a radioactive source used in a Radiological Dispersal Device). It is recognized that the preparation of PNs for these situations poses special challenges because all of the needed factual information may be difficult to obtain in a timely manner. Nonetheless, the content should be as factual as possible, and it is recognized that the need to supplement the PN as additional factual information is obtained may be greater for these events relative to those associated with fixed facilities. As with fixed facility events, speculation should be avoided whenever possible and speculative statements should be identified as such.

Recognizing the balance that must be made between promptness of issuance and depth of detail, attempt to include the following when applicable:

1. Radionuclides of concern
2. Actual or estimated quantity of release
3. Dose estimate, dose rate estimate, percentage of Technical Specifications (TS) or 10 CFR 20 limit, or some other means of interpreting the significance of the release or exposure
4. Areas involved (restricted, unrestricted, or owner controlled).

If the licensee or the NRC plans to issue or has issued a press release, so state. The PN should not contain negative statements such as "no media interest is expected."

If media inquiries have been made, the PN should so state.

When reference is made to a regional office, that office should be identified by location as well as by number the first time it is used in each PN.

PNs should not include the names of licensee employees; rather, the title of individuals should be used when it is necessary to specify an individual. An exception to this is when individual names are important to the notification and the names have previously been provided to the public.

PNs must not contain any information exempt from disclosure under 10 CFR 95 such as classified, proprietary, safeguards or Privacy Act information.

If State Program Offices or other affected organizations have been notified, identify the states or organizations, and the method of notification.

If the PN contains all the pertinent information expected to be received regarding the matter being reported, and no further action is believed necessary, then the PN should contain a statement similar to the following:

This preliminary notification is issued for information only and no further action by the staff is anticipated.

The closing paragraph of the body of the PN must contain information regarding the time and manner of receipt of information. A standard sentence similar to the following should be included in each PN:

Region ____ received initial notification of this occurrence by ____ (the means of notification, that is, letter, telegram, or telephone call) from ____ (source of information) at (time and date). The information presented herein has been discussed with the licensee, and is current as of ____ (time and date).

- e-h. ADAMS Accession Number (ML# from the Main library) |
- e-i. Contact(s) - The PN should include the names, telephone numbers, and e-mail addresses of individuals who can supply additional information if needed. Two contacts are normally listed. |

1120-10 ACTIONS FOLLOWING RECEIPT OF INFORMATION

10.01 Normal Duty Hours. After information about an event of the type described in 1120-07, or of like significance, is received by a region, prompt consideration is given to the necessity for a Conference Call (see Section 1120-08). If Conference Call Notification is likely, the regional administrator, or designee, recommends to the appropriate HQ office director, or designee, that such notifications be made. The office director ensures that the required Conference Call is promptly made (normally within one hour after receipt of the initial report), either by assuming responsibility for making the necessary notifications, or by requesting the appropriate region make the notifications.

When information about an event is first received by the Headquarters Operations Officer (HOO) rather than by a region, the HOO reports the event to the cognizant Regional Duty Officer (RDO), and the HQ Emergency Officer (EO), as appropriate. The event is evaluated and a decision regarding telephonic notification is made by the EO, in accordance with 1120-08. The telephonic notification briefing is set up by the HOO, if requested (see Section 1120-08.03).

Following the above decision, and action if required, concerning telephonic notification, a PN is prepared and electronically dispatched, normally within 2 hours after receipt of the initial information.

10.02 Other than Normal Duty Hours. Information about a significant event received during other than normal duty hours will most likely be reported initially to the HOO, who in turn reports the event to the cognizant RDO and the EO, as appropriate. The event is evaluated, and a decision regarding telephonic notification is made by the EO, in

accordance with 1120-08. The telephonic notification briefing is then set up by the HOO if requested (see Section 1120-08.03).

The appropriate regional administrator or HQ office director, or their designees, ensures that information received during other than normal duty hours concerning events which meet the PN criteria is disseminated by PN. These PNs should be dispatched electronically within two hours after resumption of normal duty hours, or sooner if conditions warrant.

10.03 The appropriate regional administrator or HQ office director, or their designees, notifies the Office of Public Affairs and the Office of State and Tribal Programs by telephone when a PN is being issued that has direct or indirect connection with Agreement States and involves radioactive materials (primarily exposures, transportation accidents, theft of sources, etc.). Note that there is a 48 hour (2 business days) delay for Agreement State ENs and PNs. Information pertaining to this requirement can be located in STP-02-047 (available in ADAMS ML021650172), dated June 13, 2002.

10.04 If the NRC enters the **Monitoring**, Activation or Expanded Activation Modes of the NRC Incident Response Plan, only an initial PN is issued. Status Summary reports are issued in lieu of PNs until a return to the Normal Mode occurs. Status Summary reports are distributed to the NRC offices via the e-mail system. A final PN is issued to note the disposition of the NRC response.

1120-11 DISPATCH OF PRELIMINARY NOTIFICATIONS

11.01 The issuing office shall dispatch PNs electronically. The distribution consists of three parts: (1) a basic distribution required for all PNs (list maintained by IOEB); (2) a supplementing distribution required by the issuing organization (maintained by the issuing organization); and (3) the PN specific requirements, also established by issuing organization. Anyone on the distribution list who believes that a PN has been issued, but has not received it, should call the appropriate coordinator to determine if the contact has received a copy, and if necessary, arrange to get a copy. Each office is responsible for notifying IOEB of any changes to the basic list. The above is to provide a minimum required distribution; further distribution by any of the above recipients is anticipated.

11.02 If there is a failure of the e-mail system that prevents the transmission of a PN, the issuing office should transmit the PN by facsimile to the Operating Experience Branch (IOEB) in NRR and NSIR (Operations Center). After completing the facsimile transmission, a phone call should be made by the issuing organization to the contacts listed for the Operations Center, NRR, and NMSS (when the PN is for a materials licensee). The time these calls are completed should be recorded on the retained hard copy. These phone calls will alert the HQ staff that a PN was sent and verify that the PN was received. The contacts will assist by dispatching PNs to the HQ Offices identified on the basic distribution list until equipment problems have been corrected. Copies will be hand carried by the Operations Center to the EDO's office and to the mailroom of the Office of the Secretary for distribution to the Commission. The Operations Center should provide a copy to the Director, NSIR.

11.03 An example of the basic distribution list that shall be utilized by the issuing office for all PNs is available in ADAMS at ML003736389. Each region should supplement this distribution list by making direct distribution to others to satisfy regional or PN specific needs. As changes occur to the PN recipient list, please contact IOEB. IOEB will update the distribution list in ADAMS. The distribution list for security-related PNs should be modified to ensure that only recipients with a need to know are included.

1120-12 SUPPLEMENTAL PRELIMINARY NOTIFICATION

Supplemental PNs are normally issued when it is necessary to promptly notify the Commission and other NRC management of additional or corrected information relating to a significant matter previously described in a PN. This may occur, for example, if the situation previously described in a PN worsens significantly or if the information in a PN is determined to be incorrect. Supplemental PNs may also be warranted for other than fixed facility events where the necessary factual information may be slow in developing (see Section 1120-09.g)

A supplemental PN should also be issued when the original PN was issued due to significant operational events or problems (Criterion b of Section 1120-07) at a nuclear plant. For example, when a plant shuts down, and a reactive inspection is initiated, a supplemental PN should be issued to disseminate more detailed information to all interested stakeholders. This supplemental PN should be issued as close to plant restart as possible to ensure the Commission, NRC management, and the public are informed of how the issues were resolved prior to plant restart.

1120-13 DISPOSITION OF MATTER PRESENTED IN PRELIMINARY NOTIFICATIONS

PNs need not contain sufficient information to close a matter. Also, it is not necessary that the resolution of a matter be reported through the issuance of subsequent PNs. The tracking of matters described in PNs to ensure appropriate resolution is accomplished through handling of licensee reporting and followup inspections.

1120-14 REVIEW OF ALL PNs FOR ABNORMAL OCCURRENCE REPORTING

NRC HQ and regional staffs responsible for issuing PNs shall review the events described in each PN against the criteria contained in Management Directive 8.1, "Abnormal Occurrence Reporting Procedure," and take the prescribed actions for those events meeting the criteria.

END

January 7, 1994

PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE

PNO-II-93-076B

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. The information is as initially received without verification or evaluation, and is basically all that is known by the Region II staff on this date.

Facility	Licensee Emergency Classification
Duke Power Co.	<input type="checkbox"/> Notification of Unusual Event
Mcguire 2	<input type="checkbox"/> Alert
Cornelius, North Carolina	<input type="checkbox"/> Site Area Emergency
Dockets: 50-370	<input type="checkbox"/> General Emergency
	<input checked="" type="checkbox"/> Not Applicable

Subject: UPDATE - SWITCHYARD INSULATOR FAILURE LEADING TO LOSS OF OFFSITE POWER

McGuire Unit 2 declared an unusual event on December 27, 1993, due to a loss of offsite power and subsequent safety injection. An Augmented Inspection Team (AIT) was dispatched to the site on December 29, and a Confirmation of Action Letter (CAL) was issued to Duke Power Company on December 29, 1993.

The AIT leader held an exit meeting with the licensee on January 5, 1994, in Washington, D. C., and conducted a press conference on January 6, 1994.

The licensee's corrective actions were sufficiently comprehensive to resolve the problems identified by the Augmented Inspection Team. A restart meeting was held among the licensee, Region II, Atlanta, GA, and NRR on January 5, 1994, to satisfy the requirements of the CAL.

Based on the AIT findings, verification of the completion of the licensee's corrective actions by the Resident Staff, reviews made by NRR and discussions during the restart meeting, the Regional Administrator has concurred in the restart of McGuire Unit 2. The unit is currently at 50% power. Region II received initial notification of this occurrence by a telephone call from the licensee at 22:22 (EST) on December 27, 1993. The information presented herein has been discussed with the licensee, and is current as of 8:00 a.m., January 7, 1994.

This preliminary notification is issued for information only and no further action by the staff is anticipated.

ADAMS Accession Number: ML123456789

Contacts:	K. Gray	B. Rini
	(301) 415-1166	(301) 415-3931
	kag@nrc.gov	<u>bar3@nrc.gov</u>

Attachment 1

Revision History For IMC 1120

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	06/12/06	Revision history reviewed for last four years	None	N/A	N/A
N/A	12/16/03 CN-03-041	Revised to reflect current usage of the WordPerfect software, and current NRC organizations.	None	N/A	ML032810659
N/A	06/22/06 CN-06-014	Revised to further enhance public confidence by requesting issuance of a supplemental preliminary notification (PN) when the original PN was issued due to a plant shutdown caused by significant operational events or problems. Revised to reflect organizational changes and make other editorial changes. Also, Exhibit 2 was removed.			ML061630401

N/A	06/09/09 CN 09-014	Revised to remove all references to Morning Reports and add FSME as a program office. Section 07 Criteria re-written and categorized by type of event. Deleted some outdated criteria (i.e., initial criticality, construction delays, etc)	None	N/A	ML091320025
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