February 28, 2011

MEMORANDUM TO: Mark Tonacci, Branch Chief
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

FROM: Janelle B. Jessie, Project Manager **/RA/**
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: HYDROLOGY REGULATORY AUDIT SUMMARY FOR THE VICTORIA COUNTY STATION EARLY SITE PERMIT APPLICATION

By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted the Victoria County Station (VCS) Early Site Permit (ESP) Application to the U.S. Nuclear Regulatory Commission (NRC) for review. As part of its review, the Hydrologic Engineering Branch (RHEB) conducted an audit of the documentation supporting Chapter 2.4 (Hydrology) of the Site Safety Analysis Report (SSAR). Particularly, the staff audited the methodology, analysis, calculations and modeling results in support of the Hydrology section of the application.

The staff conducted the audit in two parts. The first part was a visit to the site in October 2010 where the NRC staff toured the proposed site with representatives from Exelon to obtain a better understanding of the site layout. For the second part of the audit, the staff reviewed documents at the Bechtel Office in Frederick, Maryland from November 30, 2010 to December 1, 2010 (see the Audit Plan at ML103130168). Enclosed are the November 2010 audit summary, audit agenda and a list of the NRC and Exelon team members who participated in the audit as well as the agenda, list of attendees and presentations from the site visit.

CONTACT: Janelle B. Jessie, NRO/DNRL
301-415-6775

Docket Nos.: 52-042

Enclosures:
As stated

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JGiacinto, NRO	LGoldin, OGC	HJones, NRO

ADAMS Accession No.: ML110060399 **NRO-002**

OFFICE	DNRL/BWR/PM	DNRL/BWR/LA	DSER/RHEB/TR	DSER/RHEB/BC	DNRL/BWR/PM
NAME	JJessie	SGreen *via e-mail	JCaverly	RRaione	ACubbage
DATE	02/18/11	02/22/11	02/22/11	02/23/11	02/28/11

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VICTORIA COUNTY STATION EARLY SITE PERMIT APPLICATION

HYDROLOGY AUDIT SUMMARY

1. Background

Exelon submitted ground and surface water modeling documentation to the U.S. Nuclear Regulatory Commission (NRC) as part of their Victoria County Station (VCS) Early Site Permit (ESP) application. In preparation for the audit, the staff reviewed the documentation within Section 2.4 of the Site Safety Analysis Report (SSAR) and identified information needs that would promote a better understanding of the detailed analyses and bases underlying the formal application.

In preparation for the audit, the staff visited the proposed site location in an effort to become familiar with the site layout. This provided the staff with more insight as to the relevance of the information needs that were identified during the staff's initial review of Section 2.4 of the SSAR. During the audit, the staff reviewed ground and surface water models, supporting modeling documentation and calculation packages. The audit allowed the staff to better understand the modeling results in order to make accurate safety conclusions concerning site characteristics and assess the radiological consequences of accidental releases to ground and surface water. It also assisted the staff in identifying requests for additional information needed to allow the staff to conduct a complete review of the VCS ESP application.

2. Regulatory Basis

- 10 CFR Part 100
- 10 CFR Part 50
- 10 CFR 52.17
- 10 CFR 52.79

3. Documents Reviewed

- Early Site Permit (ESP) Application, Rev. 0, Section 2.4
- Information Needs (*See* Audit Plan at ML103130168)

4. Audit Results

See ML110060426

Enclosure 1

Victoria County Station Early Site Permit
Hydrology Audit 2010 Agenda
November 30, 2010 - December 2, 2010

Tuesday, November 30, 2010 (Surface and Ground Water)

8:30 a.m.	Introductions and Review of audit goals/process
9:00 a.m.	Surface Water Audit
10:30 a.m. – 10:45 a.m.	Break
12:00 p.m.	Lunch
12:45 p.m.	Reconvene – continue Surface Water Audit
2:15 p.m. – 2:30 p.m.	Break
3:45 p.m.	Begin Wrap up of discussion
4:00 p.m.	Reconvene to recap/review discussions (All)
4:30 p.m.	Dismiss

Wednesday, December 1, 2010 (Ground Water and Tsunami)

8:30 a.m.	Introductions and Review of audit goals/process
9:00 a.m.	Ground Water Audit/Tsunami Audit
10:30 a.m. – 10:45 a.m.	Break
12:00 p.m.	Lunch
12:45 p.m.	Reconvene -- continue Ground Water/Tsunami Audit
2:15 p.m. – 2:30 p.m.	Break
3:45 p.m.	Begin Wrap up of separate discussions (Ground Water/Tsunami Audits)
4:00 p.m.	Reconvene to recap/review discussions (All)
4:30 p.m.	Dismiss

Enclosure 2

Thursday, December 2, 2010 (only if needed for Ground Water and Tsunami)

8:30 a.m.	Introductions and Review of audit goals/process
9:00 a.m.	Continue Ground Water and/or Tsunami Audit (as needed)
10:30 p.m. – 10:45 a.m.	Break
12:00 p.m.	Lunch
12:45 p.m.	Reconvene -continue Ground Water and/or Tsunami Audit (as needed)
2:15 p.m. – 2:30 p.m.	Break
3:45 p.m.	Begin Wrap up of separate discussions (Ground Water and/or Tsunami Audits)
4:00 p.m.	Reconvene to recap/review discussions (All)
4:30 p.m.	Dismiss

Friday, December 3, 2010 (only if needed for continuation of Tsunami discussion)

8:30 a.m.: Introductions and Review of audit goals/process

9:00 a.m.: Continue Tsunami Audit

11:15 a.m.: Begin Wrap up of Discussion

11:30 a.m.: Reconvene to recap/review discussions (All)

12:00 p.m.: End of Audit

All times listed are approximate and for planning purposes only. Adjustments may be made during the meeting as necessary.

Victoria County Station Early Site Permit Participants
Hydrology Audit 2010 Participants
November 30, 2010 - December 2, 2010

Name	**Affiliation**	**Name**	**Affiliation**
Ian Cozens	NRC	Christopher Kerr	Exelon
Cagri Turan	Bechtel	Dan Patton	Bechtel
Periandros Samothrakis	Bechtel	David Distel	Exelon
Yonas Kinfu	Bechtel	Joseph Giacinto	NRC
Yifan Zheng	Bechtel	Hillol Guha	Bechtel
Patrick Lynett	USGS	Jason Chaytor	USGS
Dave Fenster	Bechtel	Peter Chaput	NRC
Tom Wood	INL	Margaret Sharkey	NRC
Tom Nicholson	NRC	Dennis Mekkers	USACE
Paul Kumar	Bechtel	Garrett Day	Bechtel
David Distel	Exelon	Larry Young	Bechtel
Christopher Kerr	Exelon	Tom Wood	INL
Dan Patton	Bechtel	Ralph Cady	NRC
Jerry Hale	NRC	Tom Nicholson	NRC
Peter Chaput	NRC	Patrick Lynett	USGS
Janelle Jessie	NRC	Cargri Turan	Bechtel
Jason Chaytor	USGS	Jill Caverly	NRC
Joseph Giacinto	NRC	Yonas Kinfu	Bechtel
Dennis Mekkers	USACE	Henry Jones	NRC
Wade Ross	USACE	Jan Renfro	Bechtel
Jill Caverly	NRC	Alice Carson	Bechtel
Margaret Sharkey	NRC	Dave Fenster	Bechtel
Alice Carson	Bechtel	Jerry Hale	NRC

Enclosure 3

Exelon Victoria County Site
Agenda for NRC Hydrology Audit
Part 1 – Site Visit

Meeting Location:
Holiday Inn Express Hotel & Suites
111 Huvar Street
Victoria, TX 77901
(361) 575-1600

Attendee List	Affiliation
Dave Distel	Exelon
Chris Kerr	Exelon
Joshua Trembley	Exelon
Pat Fagan	Land Owner Rep
TBD	GBRA
Dan Patton	Bechtel
Kit Ng	Bechtel
Garrett Day	Bechtel
Yonas Kinfu	Bechtel
Cagri Turan	Bechtel
Janelle Jessie	NRC
Jill Caverly	NRC
Richard Raione	NRC
Henry Jones	NRC
Joseph Giacinto	NRC
Margaret Sharkey	NRC
Wade Ross	USACE
Dennis Mekkers	USACE
Tom Woods	INL
TBD	INL
Eric Geist	USGS
Pat Lynette	USGS

Enclosure 4

Exelon Victoria County Site
Agenda for NRC Hydrology Audit
Part 1 – Site Visit

Time	Activity	Lead	Remarks
7:15 a.m.- 7:30 a.m.	Sign in		Donations collected for lunch
7:30 a.m.- 7:40 a.m.	Welcome / Introductions	Exelon / NRC	Reiterate purpose and goals of visit
7:40 a.m.- 7:55 a.m.	Site Overview; Review maps/figures	Exelon – Distel	Address general questions
7:55 a.m.- 8:10 a.m.	SW Presentation	Bechtel	"
8:10 a.m.- 8:25 a.m.	GW Presentation	Bechtel	"
8:25 a.m.- 8:55 a.m.	Drive to Victoria Site	Exelon	• Meet Pat Fagan at met tower • Portable toilet facilities will be available
8:55 a.m.- 9:05 a.m.	Site safety brief and reorientation	Exelon	Discuss proximity to northern and western site boundaries
9:05 a.m.- 9:40 a.m.	Power Block area	Exelon	View monitoring well locations within Power Block, discuss orientation of CB to Power Block
9:40 a.m.- 10:10 a.m.	Linn Lake	Exelon	View Linn Lake, eastern site boundary, and down-gradient boundary wells (OW-2324 cluster)
10:10 a.m. – 10:45 a.m.	Cooling Basin area	Exelon	Point out wetland areas, ephemeral streams, and OW2320 well cluster along drive across CB area
10:45 a.m.- 11:00 a.m.	Kuy Creek	Exelon	Discuss proximity to southern and western property boundaries
11:00 a.m.- 11:30 a.m.	Pass out lunches and drive to VCS intake / GBRA tour	Exelon	• Sandwiches and water brought to the site in the morning by Exelon • Meet GBRA at corner of Hwy 35 and Rt. 239
11:30 a.m.- 12:45 p.m.	VCS intake canal and pumphouse location	Exelon / GBRA	• VCS intake canal and pumphouse location • Guadalupe River • GBRA saltwater barrier • GBRA diversion canal
12:45 p.m.- 1:00 p.m.	Debrief and meeting close	Exelon / NRC	• Take Hwy 35 east to Hwy 185; 185 to 59 (Houston) • Point out view of VBC at Hwy 35 bridge crossing

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Site Visit Agenda

- ✓ Project Overview – David Distel (Exelon)
- ✓ Surface Water Overview – Kit Ng (Bechtel)
- ✓ Groundwater Overview – Garrett Day (Bechtel)
- ✓ Safety Briefing – Joshua Trembley (Exelon)

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ESP Application Overview

✓ VCS Early Site Permit Application

- Submitted to NRC on March 25, 2010
- Accepted and Docketed on June 8, 2010
  - No Hydrology related acceptance review issues identified
- Safety & Environmental Review Schedule issued August 31, 2010
  - Four phase Safety Review
  - RAIs and supplemental RAIs issued by October 2011
  - Advanced Safety Evaluation with no open items developed by August 2012

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ESP Application Overview

- ✓ VCS ESPA utilizes the initial VCS COLA site engineering and environmental evaluations to maximum extent possible
  - Essentially converted the COLA to an ESP application – significant level of site data obtained
  - Updated to address relevant Part 52 applicant RAIs and VCS COLA acceptance review issues
  - Updated to include additional site data (e.g. meteorological data, ground water levels)
  - Follows RG 1.206/NUREG-0800 and NUREG-1555 format and content
- ✓ PPE Approach Utilized
  - Establishes set of Site Characteristics and Site Related Design Parameters expected to envelope the design of a reactor or reactors that might be later deployed at the site

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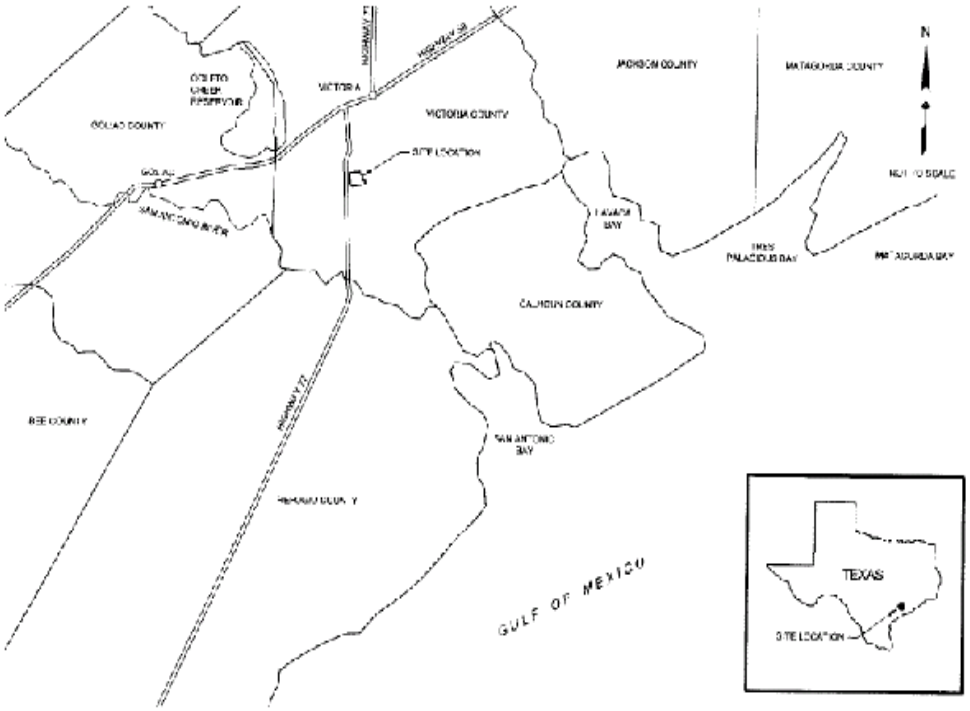
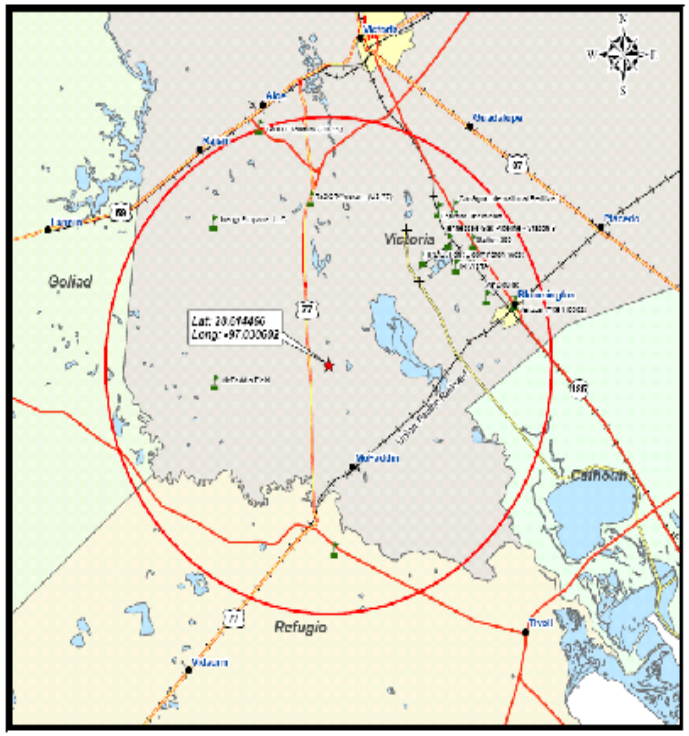
Victoria County Station Site

- ✓ Approximately 13 miles south of Victoria, one mile northeast of McFaddin; bordered to the east by Linn Lake and to the west by Highway 77
- ✓ Approximately 11,500 acres
- ✓ "Greenfield" site that has been in agricultural use since at least 1952 for cattle grazing, with some oil and gas production

Site Location Map



Site Location Map
Potential 10-Mile EPZ



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Site Features

- ✓ Power Block Area – Based on the bounding footprint size for a large two-unit LWR
- ✓ 4,900 acre cooling basin will be used for cooling water
  - No safety function
  - Makeup water from the Guadalupe River
  - Approximately 103,600 acre-ft total storage capacity
- ✓ Proximity to Victoria Barge Canal and Highway 77 advantageous for deployment

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Facility Makeup and Liquid Effluents

- ✓ Station water and potable water supplied via onsite production wells
- ✓ Cooling basin makeup water delivered from the Guadalupe River
  - Intake canal and pumphouse located below the confluence of the San Antonio and Guadalupe Rivers, upstream of the GBRA saltwater barrier
  - Design intake capacity = 217 cfs
  - Intake maximum through-screen velocity = 0.5 fps
  - Would deliver up to 75,000 acre-feet / year to the onsite cooling basin
- ✓ Facility effluents
  - Non-radiological effluents discharged to the cooling basin
  - Cooling basin blowdown and routine liquid radiological effluents pumped to a diffuser in the Guadalupe River
  - Blowdown pipeline would parallel the Victoria County Navigation District (VCND) transportation corridor

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ESP Application Review

✓ Exelon Online Reference Portal

- Available for NRC safety and environmental reviews – including NRC Hydrology Audit technical visit information needs
- Provides NRC and NRC-contracted staff read-only access to basis documents and other reference material cited in the Exelon VCS ESP application – organized by SSAR and ER section
- Password protected and printing, saving, or downloading of documents disabled
- Documents identified by NRC staff as necessary to have to conduct the review will be formally submitted on the docket by Exelon

[redacted]

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Exelon Victoria County Station Site

Early Site Permit
Surface Water Overview

NRC Hydrology Audit Site Visit

October 18, 2010

Surface Water Overview

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- ✓ Regional Hydrologic Setting
  - Gulf of Mexico - 36 miles to the south of VCS
  - River Basins: Guadalupe River (5953 mi^2); San Antonio River (4180 mi^2)
  - Bays: San Antonio Bay
  - Storage Reservoirs: 29 in Guadalupe River Basin, 34 in San Antonio River Basin
  - Major Dams: Canyon Dam, Coleto Creek Dam
  - Other Water Features:
    - Kuy Creek (62 mi^2), Coleto Creek (514 mi^2), both tributaries to Guadalupe River
    - Linn Lake (470 acres shallow depression east of VCS)
    - Intermittent/ephemeral streams/creeks, wetlands
    - Victoria Barge Canal
    - GBRA Calhoun Canal System including the Diversion Dam and Saltwater Barrier at Tivoli

- ✓ Proposed VCS Hydrologic Features/Characteristics
  - 4900-acre Cooling Basin south of Power Block
  - Raw Water Makeup System Intake on Guadalupe River with maximum annual diversion rate of 75,000 acre-feet
  - Blowdown Outfall on Guadalupe River
  - Power Block Finish Site Grade at 95 ft NAVD88 min.
  - Natural Grade in Cooling Basin from 80 ft NAVD88 (north) to 65 ft NAVD88 (south)

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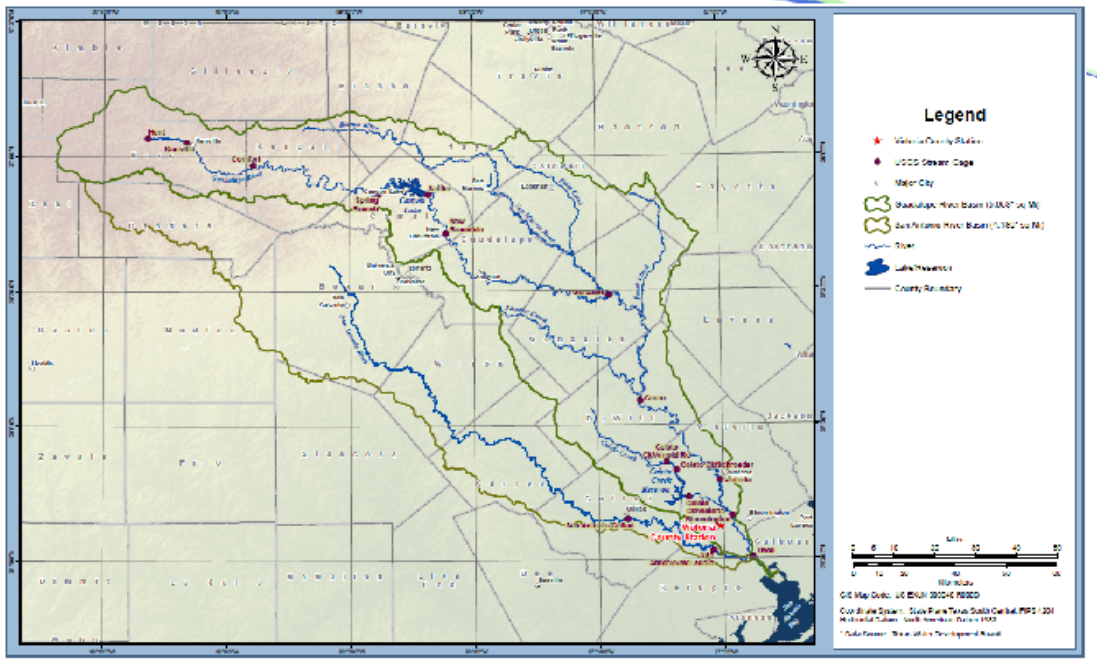
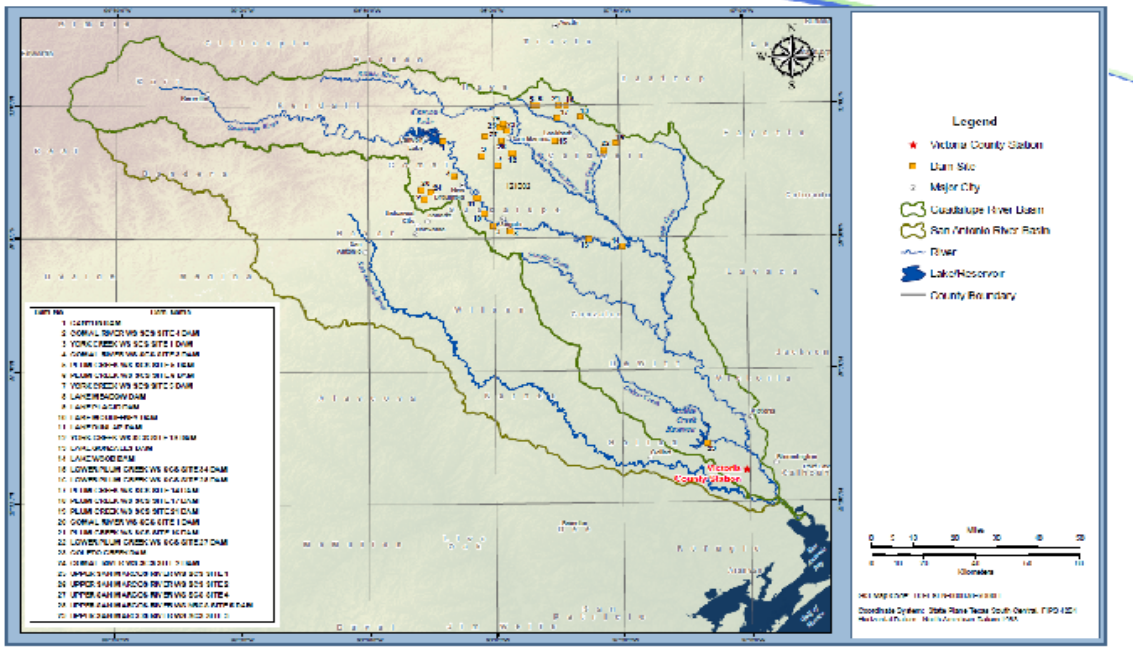
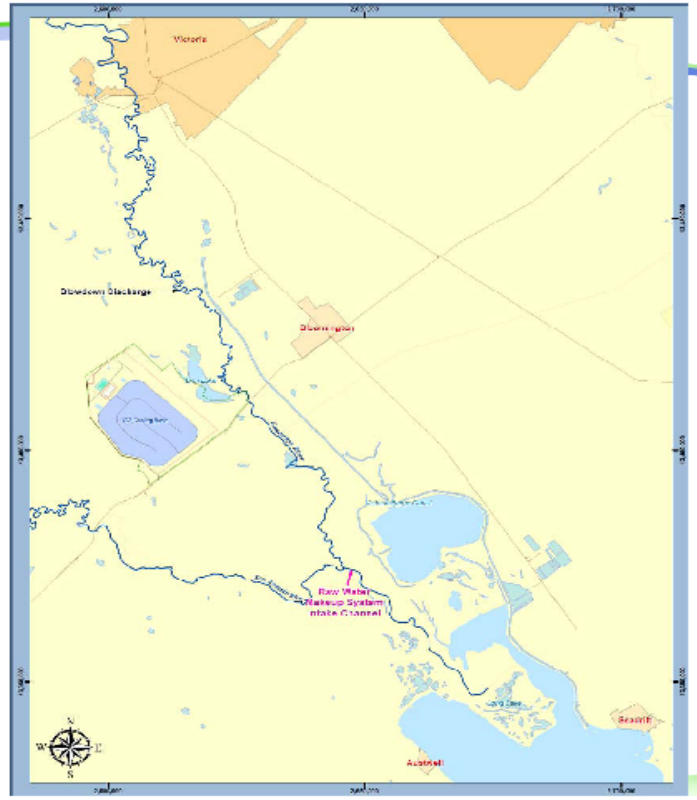
Regional Surface Water Features



River Basins and Selected Stream Gages



Dams in Guadalupe River Basin



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Proposed VCS Hydrologic Features

Hydrologic Hazards at VCS

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- ✓ Potential Flooding Hazards
  - Probable Maximum Stream Flooding from Guadalupe River (SSAR 2.4.3)
  - Upstream Dam Failures - Canyon Dam and Coleto Creek Dam (SSAR 2.4.4)
  - Breaching of Cooling Basin Embankment (SSAR 2.4.4)
  - Probable Maximum Storm Surge from Gulf (SSAR 2.4.5)
  - Surge from Probable Maximum Tsunami (SSAR 2.4.6)
  - Breaching of Ice-Jams (SSAR 2.4.7)
  - Channel Diversions and Migrations (SSAR 2.4.9)
  - Flooding from Local Intense Precipitation is Technology Dependent and Not Evaluated in ESP Application (SSAR 2.4.2)
- ✓ Flood Protection Requirements (SSAR 2.4.10)
  - Power Block Minimum Finish Site Grade at 95 ft NAVD88
  - Design Basis Flood Level (from External Event) is 91 ft NAVD88 Due to Postulated Breaching of Cooling Basin Embankment.
  - No Structural Flooding Protection Measures for Safety SSCs Required at VCS
  - Stormwater Drainage System (would be designed during COL Application Stage) will Divert Runoff Away from Power Block to Avoid Flooding during Local PMP Event
- ✓ Low Water Considerations (SSAR 2.4.11)
  - Stream Flow (Low Flow) Frequency Analysis Performed
  - Stream or River Not Relied On for Safety Water Supply
  - Cooling Basin (for nonsafety cooling) Has Adequate Inventory for Continuous Plant Operation through Drought Equivalent to the 1950s Drought of Record for the Region

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Groundwater Overview

✓ VCS Site

- Situated in the Coastal Prairies sub-province of the Gulf Coastal Plains physiographic province.
- A gently sloping plain covers most of the VCS site. Ground surface elevation ranges from approximately 85 feet NAVD 88 (northwest) to approximately 65 feet NAVD 88 (southeast) except where the site slopes to the Guadalupe River valley, elevation approximately 15 feet NAVD88 at Linn Lake.
- Kuy Creek and Dry Kuy Creek are the dominate pre-existing surface water features at the site. Drainage pattern is generally dendritic and ephemeral.

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Exelon Victoria County Station Site

Early Site Permit
Groundwater Overview

NRC Hydrology Audit Site Visit

October 18, 2010

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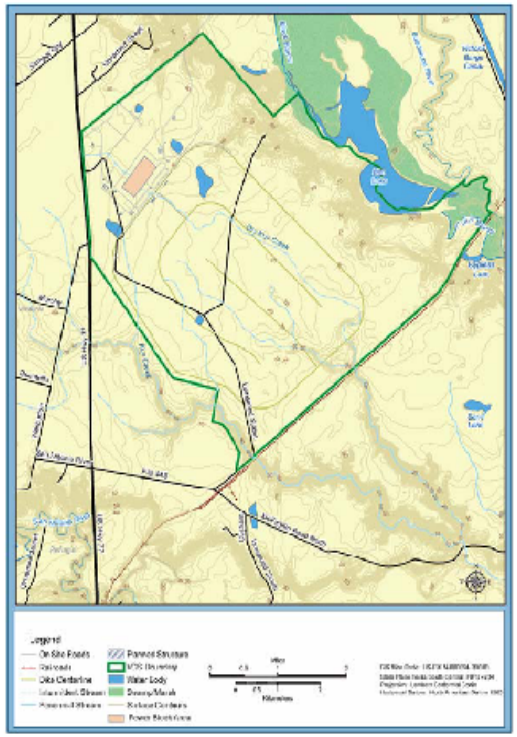
Site Location Plan



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Groundwater Overview

✓ REGIONAL GROUNDWATER AQUIFERS

- The VCS site is underlain by a thick wedge of southeasterly dipping sedimentary deposits and overlies the Gulf Coast Aquifer System.
- The Gulf Coast Aquifer System consists of alternating beds of clay, silt, sand and gravel.
- The Gulf Coast Aquifer, in general, is subdivided into four major hydrogeologic units. From shallowest to deepest they are:
  - Chicot Aquifer
  - Evangeline Aquifer
  - Jasper Aquifer (contains the Burkeville Confining System)
  - Catahoula Confining System
- The principal aquifers in Victoria County are the ***Chicot*** and ***Evangeline***.

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Groundwater Overview

✓ LOCAL GROUNDWATER AQUIFERS

- The ***Chicot Aquifer*** extends to a depth of approximately 400 feet (elevation of approximately -300 feet) beneath the site.
  - Primary aquifer of interest for plant construction, site development, and accidental release analysis.
  - Evaluated through literature and state database reviews, and from data collected during site geotechnical subsurface investigations.
- The ***Evangeline Aquifer*** underlies the Chicot Aquifer to a depth of approximately 1,100 feet (elevation of approximately -1,000 feet).
  - Identified source of groundwater for plant operations (proposed on-site well field).
  - Evaluated through literature and state database reviews.
- Primary plant water demands is for cooling and will be from surface water sources.
  - Groundwater is a secondary source for plant non-cooling use.

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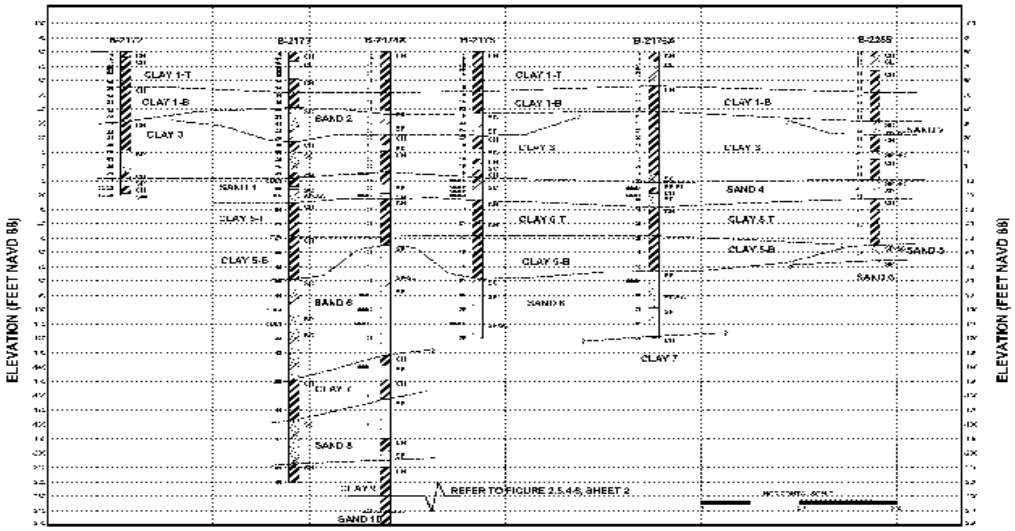
Groundwater Overview

✓ SUBSURFACE INVESTIGATION PROGRAM

- Evaluate site geotechnical, geologic and hydrogeologic conditions to a depth of up to 600 feet.
- Subsurface information was collected from more than 200 geotechnical borings, geologic/geophysical borings, cone penetrometer tests (CPTs), shallow test pits, groundwater observation and test wells, and borehole permeameter tests.
- Laboratory Analysis:
  - Geotechnical properties.
  - Distribution Coefficients (Kd) for selected isotopes (in support of SSAR 2.4.13 – Accidental Release of Radioactive Liquid Effluents in Ground and Surface Water).

Subsurface Profile: Unit 1 (West – East)



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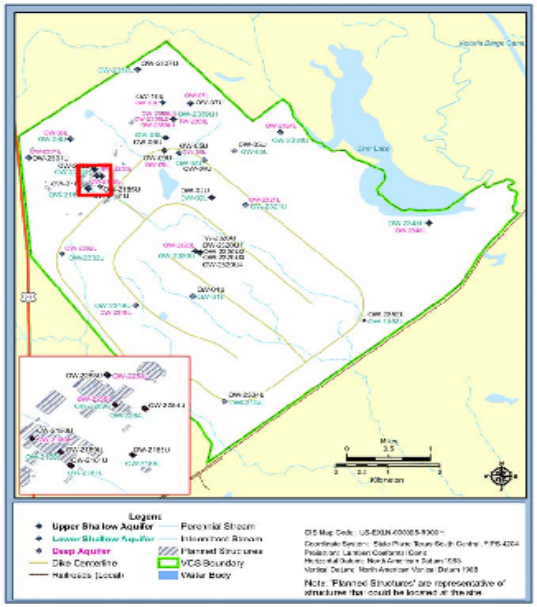
Groundwater Overview

✓ GROUNDWATER SPECIFIC FIELD INVESTIGATION

- Geotechnical Borings Logs, Geophysical Logs, and Laboratory Tests: Used to derive site hydrostratigraphy.
- Groundwater Observation Wells: 27 well pairs (54 observation wells).
  - Well depths ranged from approximately 45 to 155 feet.
  - Geochemical water samples were collected from a subset of these wells.
- Slug Tests: Tests conducted in the observation wells.
- Aquifer Pumping Tests: Two aquifer pumping test well clusters.
  - Each well cluster consisted of 1 test well and 4 observation wells.
  - Test well depths: Approximately 80 feet and 180 feet.
- Borehole Permeameter Tests: Tests preformed at 16 locations.
  - Boreholes located in the footprint of the proposed Cooling Basin.
  - Test depths: Approximately 5 and 10 feet.

Site Well Location Plan



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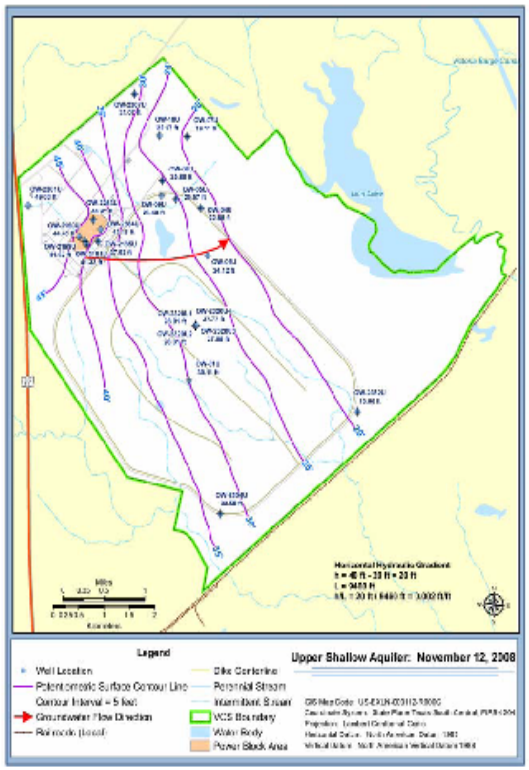
Groundwater Overview

✓ CHICOT AQUIFER – SITE CONDITIONS

- Groundwater encountered at depths of approximately 30 to 60 feet beneath the site.
- The Chicot Aquifer was subdivided into the following hydrostratigraphic units:
  - A discontinuous, unsaturated (vadose zone) sand unit encountered in the clay units above the water table.
  - A Shallow Aquifer consisting of interbedded sand layers to a depth of approximately 120 feet below ground surface.
    - Upper Shallow Aquifer (approximately 50 to 80 feet below ground surface).
    - Lower Shallow Aquifer (approximately 90 to 120 feet below ground surface).
  - A Deep Aquifer consisting of interbedded sand layer from approximately 130 to 280 feet below ground surface.
- The groundwater flow direction is generally to the east towards the Guadalupe River Valley.

Potentiometric Surface Map



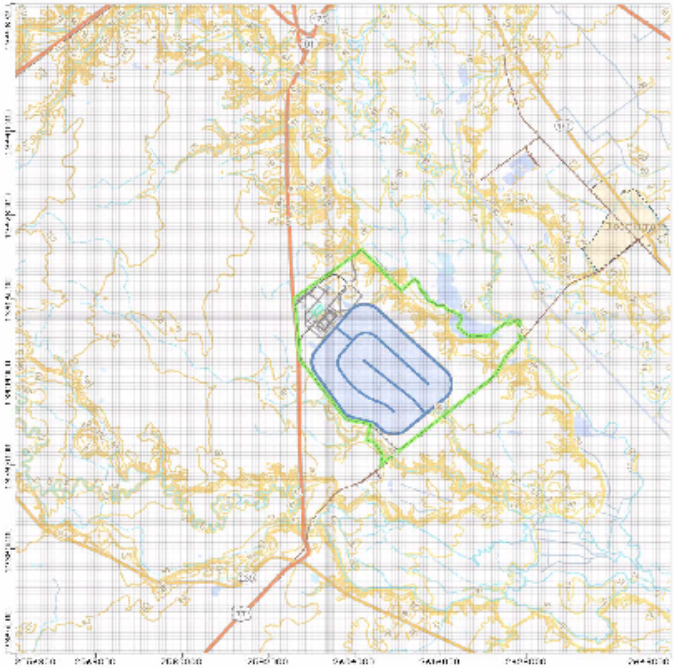
Exelon Generation

Groundwater Overview

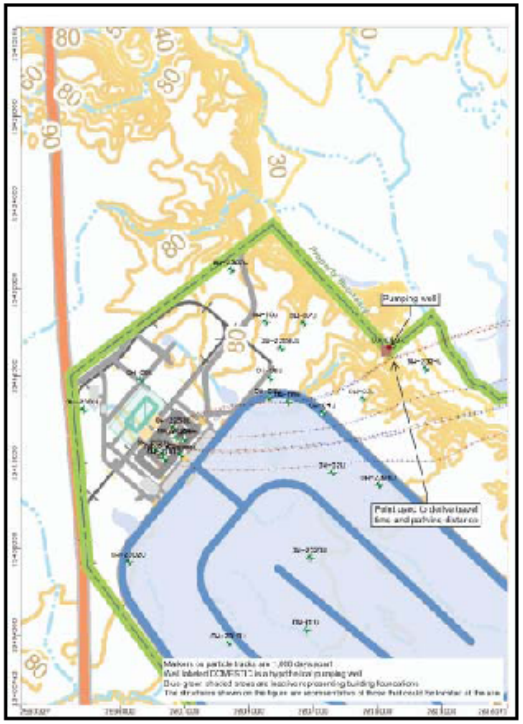
✓ GROUNDWATER FLOW MODEL

- An eleven layer, numerical groundwater flow model was developed to assist with the interpretation of the subsurface hydrogeologic materials and to simulate post-construction groundwater conditions.
  - Seepage rate from the cooling basin into the site groundwater systems.
  - Post-construction groundwater level in the power block.
  - Plant construction dewatering.
  - Postulated, post-construction accidental release pathways.

Plan View of Modeling Grid



Accidental Release Particles Tracks



ESP - Exelon - Victoria Mailing List (Revised 02/15/2011)

cc:

Ms. Michele Boyd
Legislative Director
Energy Program
Public Citizens Critical Mass Energy
and Environmental Program
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