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

February 23, 2011

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATION CHANGE REGARDING CONTAINMENT BUILDING PENETRATIONS DURING REFUELING OPERATIONS (TAC NO. ME3418)

Dear Sir or Madam:

The Commission has issued the enclosed Amendment No. 231 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated February 22, 2010, as supplemented by letters dated December 3, 2010, and January 19, 2011.

The amendment modifies TS 3/4.9.4, "Containment Building Penetrations," to allow alternative means of penetration closure during core alterations or irradiated fuel movement while in refueling operations. In addition, certain improvements to this TS, as well as the elimination of TS 3/4.9.9, "Containment Purge Valve Isolation System," have been made. The changes are similar to Revision 3 of NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants."

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

Sincerely,

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures:
1. Amendment No. 231 to NPF-38
2. Safety Evaluation

cc w/encls: Distribution via Listserv

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

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 231
License No. NPF-38

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

   A. The application for amendment by Entergy Operations, Inc. (EOI), dated February 22, 2010, as supplemented by letters dated December 3, 2010, and January 19, 2011, 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. NPF-38 is hereby amended to read as follows:

   2. Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 231, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating
License No. NPF-38 and
Technical Specifications

Date of Issuance: February 23, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 231

TO FACILITY OPERATING LICENSE NO. NPF-38

DOCKET NO. 50-382

Replace the following pages of the Facility Operating License and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License

REMOVE	INSERT
-4-	-4-

Technical Specifications

REMOVE	INSERT
3/4 3-31	3/4 3-31
3/4 9-4	3/4 9-4
3/4 9-10	3/4 9-10

or indirectly any control over (i) the facility, (ii) power or energy produced by the facility, or (iii) the licensees of the facility. Further, any rights acquired under this authorization may be exercised only in compliance with and subject to the requirements and restrictions of this operating license, the Atomic Energy Act of 1954, as amended, and the NRC's regulations. For purposes of this condition, the limitations of 10 CFR 50.81, as now in effect and as they may be subsequently amended, are fully applicable to the equity investors and any successors in interest to the equity investors, as long as the license for the facility remains in effect.

(b) Entergy Louisiana, LLC (or its designee) to notify the NRC in writing prior to any change in (i) the terms or conditions of any lease agreements executed as part of the above authorized financial transactions, (ii) any facility operating agreement involving a licensee that is in effect now or will be in effect in the future, or (iii) the existing property insurance coverages for the facility, that would materially alter the representations and conditions, set forth in the staff's Safety Evaluation enclosed to the NRC letter dated September 18, 1989. In addition, Entergy Louisiana, LLC or its designee is required to notify the NRC of any action by equity investors or successors in interest to Entergy Louisiana, LLC that may have an effect on the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

1. Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3716 megawatts thermal (100% power) in accordance with the conditions specified herein.

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 231, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

TABLE 3.3-6 (Continued)

ACTION STATEMENTS

ACTION 23 - DELETED

ACTION 24 - DELETED

ACTION 25 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.4.

ACTION 26 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.

ACTION 27 - With the number of OPERABLE channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable Channel(s) to OPERABLE status within 72 hours, or:

1. Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and

2. If the monitor is not restored to OPERABLE status within 7 days after the failure, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 28 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirements, operation of the plant may continue for up to 30 days provided grab samples are taken once per 8 hours and these samples are analyzed for gross activity within 24 hours.

If the monitor is not restored to OPERABLE status within 30 days after the failure, continue sampling and prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment door is closed,

b. A minimum of one door in each airlock is capable of being closed, and

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1. Closed by a manual or automatic isolation valve, blind flange, or equivalent, or

2. Capable of being closed by an OPERABLE containment purge and exhaust isolation system.

Note: Penetration flow path(s) described in a, b, and c above, that provides direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4.1 Verify each required containment penetration is in the required status prior to the start of and once per 7 days during CORE ALTERATIONS or movement of irradiated fuel within containment.

4.9.4.2 Verify each required containment purge and exhaust valve actuates to the isolation position on an actual or simulated actuation signal 72 hours prior to performing initial CORE ALTERATIONS or movement of irradiated fuel within containment.

NOTE - SR 4.9.4.2 is not required to be met for containment purge and exhaust valve(s) in penetrations closed to comply with LCO 3.9.4.c.1.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 231 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated February 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100550136), as supplemented by letters dated December 3, 2010, and January 19, 2011 (ADAMS Accession Nos. ML103420289 and ML110210678, respectively), Entergy Operations, Inc. (Entergy, the licensee), requested changes to the Technical Specifications (TSs) for Waterford Steam Electric Station, Unit 3 (Waterford 3). The supplemental letters dated December 3, 2010, and January 19, 2011, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on May 4, 2010 (75 FR 23813).

The proposed amendment would include a modification of TS 3/4.9.4, "Containment Building Penetrations," that provides a revision to the containment building penetration closure requirements during core alterations or movement of irradiated fuel within the containment. The amendment also would eliminate TS 3/4.9.9, "Containment Purge Valve Isolation System." The requirements of TS 3/4.9.9 will be included in TS 3/4.9.4. The licensee is proposing these changes to provide additional containment boundary closure flexibility during refueling operations. These changes are similar to Revision 3 of NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants" (ADAMS Accession No. ML041830597).

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. The TSs ensure the operational capability of structures, systems, and components that are required to protect the health and safety of the public. The NRC's regulatory requirements related to the content of the TSs are contained in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.36) that requires that the TSs include items in the following categories: (1) safety limits, limiting safety system

settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs. As stated in 10 CFR 50.36(c)(2)(i), the "[l]imiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications ..." SRs are, in accordance with 10 CFR 50.36(c)(3), "requirements relating to tests, calibration, or inspection to assure that the necessary quality of the systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The regulations in Appendix A to 10 CFR Part 50, General Design Criterion (GDC) 16, "Containment design," state that,

> Reactor containment and associated systems shall be provided to establish an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment and to assure that the containment design conditions important to safety are not exceeded for as long as postulated accident conditions require.

NUREG-800, "Standard Review Plan [SRP] for the Review of Safety Analysis Reports for Nuclear Power Plants," Section SRP 6.2.4, "Containment Isolation System," and Section 15.7.4, "Radiological Consequences of Fuel Handling Accidents," provide guidance to the NRC staff for performing safety reviews of licensee-proposed changes to the operating license.

The NRC staff reviewed the proposed changes for compliance with 10 CFR 50.36 and NUREG-1432, Revision 3, "Standard Technical Specifications, Combustion Engineering Plants," dated June 2004. In general, licensees cannot justify TS changes solely on the basis of adopting the Standard Technical Specification (STS) model. Licensees may revise the TSs to adopt the improved STS format and content, provided that a plant-specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative, or provides clarification (i.e., no requirements are materially altered); (2) the change is more restrictive than the licensee's current requirement; or (3) the change is less restrictive than the licensee's current requirement, but nonetheless still affords adequate assurance of safety when judged against current regulatory standards.

3.0 TECHNICAL EVALUATION

Details on the current TS, proposed changes to the TS, and the NRC staff's evaluation of the changes are provided below:

Current TS ACTION 25 for TS Table 3.3-6 states:

> With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

Revised TS ACTION 25 for TS Table 3.3-6 would state:

> With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.4.

The change to TS ACTION 25 of TS Table 3.3-6 is consistent with the licensee's proposal to delete TS 3/4.9.9, and is an editorial change. Therefore, the NRC staff concludes that the change is acceptable.

Current TS 3.9.4.a states:

> The equipment door is capable* of being closed,

Revised TS 3.9.4.a would state:

> The equipment door is closed,

The change to TS 3.9.4.a results in a more conservative condition and, therefore, the NRC staff concludes that the change is acceptable.

Current TS 3.9.4.b states:

> A minimum of one door in each airlock capable * of being closed, and

Revised TS 3.9.4.b would state:

> A minimum of one door in each airlock is capable of being closed, and

The change to TS 3.9.4.b is editorial and consistent with the licensee's proposal. Therefore, the NRC staff concludes that the change is acceptable.

Current TS 3.9.4.c.1 states:

> Capable * of being closed by an isolation valve, blind flange, or manual valve, or

Revised TS 3.9.4.c.1 would state:

> Closed by a manual or automatic isolation valve, blind flange, or equivalent, or

In its letter dated February 22, 2010, the licensee stated that the Waterford 3 steam generators and reactor vessel closure head will be replaced during the planned spring 2011 refueling outage[1]. In order to do this, a hemispherical hatch cover will be removed from a 32-foot diameter construction hatch. In order to provide containment closure during movement of irradiated fuel or core alterations in MODE 6 after removal of some weld sealing the hatch cover

[1] Currently, Entergy has postponed the replacement of the steam generators until the fall 2012 refueling outage.

but prior to its complete removal, a method of containment closure equivalent to a closed isolation valve, blind flange, or manual valve or equivalent must be used since these methods, currently specified in the TS 3.9.4, do not apply. NUREG-1432, Revision 3, allows this equivalent containment closure and the licensee is proposing to use the equivalency. Therefore, the NRC staff concludes that the change to TS 3.9.4.c.1 is acceptable.

Current TS 3.9.4.c.2 states:

> Be capable of being closed by an OPERABLE automatic containment purge valve.

Revised TS 3.9.4.c.2 would state:

> Capable of being closed by an OPERABLE containment purge and exhaust isolation system.

The change to TS 3.9.4.c.2 incorporates the requirements of TS 3/4.9.9 which currently requires the containment purge valve system to be operable during core alterations and movement of irradiated fuel. In its letter dated February 22, 2010, the licensee stated that this addition to TS 3/4.9.4 is equivalent to the existing TS 3/4.9.9 which will be deleted. The NRC staff agrees that the addition to TS 3/4.9.4 is equivalent to existing TS 3/4.9.9 which will be deleted and concludes that the licensee's change is acceptable.

In the TS 3.9.4, the licensee proposed to add the following new Note under LCO 3.9.4 that states:

> Note: Penetration flow path(s) described in a, b, and c above, that provides direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

NUREG-1432, Revision 3, allows the penetration flow paths described in TS 3.9.4.a, b, and c to be unisolated under administrative control. NUREG-1432, Revision 3, describes administrative controls as adequate to ensure that (1) appropriate personnel are aware of the open status of the penetration flow path during core alterations or movement of irradiated fuel assemblies within the containment, and (2) specified individuals are designated and readily available to isolate the flow path in the event of a fuel handling accident. Since the licensee's proposed description of administrative controls is similar, the NRC staff concludes that the proposed new Note for TS 3.9.4 is acceptable.

Current TS SR 4.9.4 states:

> Each of the above required containment building penetrations shall be verified to be either in its closed/isolated condition or capable of being closed prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building.

Revised TS SR 4.9.4 would be renumbered as SR 4.9.4.1 and would state:

> Verify each required containment penetration is in the required status prior to the start of and once per 7 days during CORE ALTERATIONS or movement of irradiated fuel within containment.

The proposed change to TS SR 4.9.4 would assure that penetrations are in their required status prior to and every 7 days during core alterations and movement of irradiated fuel, as stated by NUREG-1432, Revision 3, which requires that the status of penetrations be checked every 7 days. In addition to this, the licensee also proposes to maintain the current requirement that the check of the penetration status be made prior to core alterations or movement of irradiated fuel, which is more explicit and the NRC staff concludes that the change is acceptable.

In the revised TS, the licensee proposed to add new SR 4.9.4.2, and an associated note, which would state:

> Verify each required containment purge and exhaust valve actuates to the isolation position on an actual or simulated actuation signal 72 hours prior to performing initial CORE ALTERATIONS or movement of irradiated fuel within containment.
>
> ---
>
> NOTE–SR 4.9.4.2 is not required to be met for containment purge and exhaust valve(s) in penetrations closed to comply with LCO 3.9.4.c.1.

Since the surveillance demonstrates that each containment purge and exhaust valve actuates to its isolation position on an actual or simulated high radiation signal, this change is consistent with NUREG-1432, Revision 3, SR 3.9.3.2. Additionally, the 18-month frequency specified in NUREG-1432, Revision 3, maintains consistency with other similar engineered safety feature actuation system instrumentation or valve testing requirements. However, instead of every 18 months frequency, the licensee's submittal states that the surveillance is performed prior to performing core alterations or movement of irradiated fuel. The licensee states that since Waterford 3 is on an 18-month refueling cycle, this surveillance frequency is equivalent. The 18-month surveillance interval specified in NUREG-1432, Revision 3 is in brackets meaning that it is not a firm number but subject to change when the licensee proposes a change to this TS. Based on the above, the NRC staff concludes that omitting the 18-month surveillance interval is acceptable.

Current TS 3.9.4 contains a footnote (*) associated with the LCO 3.9.4.a, 3.9.4.b, and 3.9.4.c.2, which states:

> *Administrative controls shall ensure that appropriate personnel are aware that equipment door, both personnel airlock doors and/or penetrations are open, a specific individual(s) is designated and available to close the equipment door, an airlock door and the penetrations as part of a required evacuation of containment, and any obstruction(s) (e.g., cables and hoses) that could prevent closure of an airlock door and the equipment door be capable of being quickly removed.

In the revised TS, the discussion in the footnote (*) for LCO 3.9.4 would be relocated to the TS Bases. The discussion in the footnote (*) is appropriate for inclusion in the TS Bases since it is descriptive and contains no requirements. Therefore, the NRC staff concludes that this change is acceptable.

Current TS 3/4.9.9, "Containment Purge Valve Isolation System," exists on page 3/4 9-10. In the revised TS, TS 3/4.9.9 is eliminated in its entirety. A replacement page 3/4 9-10 is being provided that which would state: "This Page Intentionally Blank."

Since the requirements of 3/4.9.9 are included in new TS section 3.9.4.c.2 as discussed above, the elimination of TS 3/4 9.9 in its entirety is editorial and the NRC staff concludes that it is acceptable. Also, as stated in its letter dated February 22, 2010, the licensee will continue to perform this SR using the associated radiation monitoring channels. There is no change to the intent of how the new SR 4.9.4.2 will be performed from that of former SR 4.9.9. Consistent with NUREG-1432, Revision 3, the ACTION under SR 4.9.9 is being relocated to the TS Bases. The NRC staff concludes that this change is acceptable. In addition, since this SR is performed during core alterations and per Waterford 3's Amendment No. 198, "Full-scope Implementation of an Alternative Accident Source Term," dated March 29, 2005 (ADAMS Accession No. ML050890248), "... no FHB [fuel handling building] or containment holdup, filtration, or recirculation is credited in the analysis," the relocation of the ACTION concerning simulation of isolation test signal from each of the required radiation monitoring instrumentation channels under SR 4.9.9 to the Bases, is acceptable.

The licensee states that the proposed changes do not require any exemptions or relief from regulatory requirements. In addition, the proposed TS changes do not affect any systems, structures, or components described in the Waterford 3 Final Safety Analysis Report. In addition, the NRC staff concludes that the licensee has provided adequate justification to support the requested changes and reasonable assurance that Waterford 3 will be able to comply with the regulatory requirements and, therefore, meets 10 CFR 50.36. These changes are consistent with or more conservative than NUREG-1432, Revision 3, and are consistent with applicable regulations and regulatory guidance. Based on the above, the staff concludes that the proposed TS changes are acceptable

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment. The State official had comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding

published in the *Federal Register* on May 4, 2010 (75 FR 23813). Additionally, parts of the amendment are editorial in nature. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10)(v). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 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: R. Lobel

Date: February 23, 2011

February 23, 2011

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATION CHANGE REGARDING CONTAINMENT BUILDING PENETRATIONS DURING REFUELING OPERATIONS (TAC NO. ME3418)

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

Sincerely,
/RA/

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382
Enclosures:
1. Amendment No. 231 to NPF-38
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ADAMS Accession No. ML110140026 ***SE memo dated 1/11/2011**

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NAME	NKalyanam	JBurkhardt	GWilson	RElliott	TTate
DATE	2/4/11	1/18/11	Not Required	2/4/11	2/4/11

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NAME	RDennig*	MSmith	MMarkley	NKalyanam
DATE	1/11/11	2/10/11	2/23/11	2/23/11

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