ENCLOSURE 1 CONTAINS PROPRIETARY INFORMATION – WITHHOLD FROM PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.390

Xcel Energy

Monticello Nuclear Generating Plant
2807 W County Rd 75
Monticello, MN 55362

March 18, 2013

L-MT-13-028
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket 50-263
Renewed License No. DPR-22

Monticello Extended Power Uprate: Replacement Steam Dryer – Responses to Requests for Additional Information (TAC MD9990)

References:

1) Letter from T J O'Connor (NSPM) to Document Control Desk (NRC), "License Amendment Request: Extended Power Uprate (TAC MD9990)," L-MT-08-052, dated November 5, 2008. (ADAMS Accession No. ML083230111)
2) Letter from T J O'Connor (NSPM) to Document Control Desk (NRC), "Monticello Extended Power Uprate: Replacement Steam Dryer Supplement (TAC MD9990)," L-MT-10-046, dated June 30, 2010. (ADAMS Accession No. ML102010462)
3) Letter from T J O'Connor (NSPM) to Document Control Desk (NRC), "Monticello Extended Power Uprate: Updates to Docketed Information (TAC MD9990)," L-MT-10-072, dated December 21, 2010. (ADAMS Accession No. ML103570026)
4) Letter from M A Schimmel (NSPM) to Document Control Desk (NRC), "Monticello Extended Power Uprate: Supplement to Revise Technical Specification Setpoint for the Automatic Depressurization System Bypass Timer (TAC MD9990)," L-MT-12-091, dated October 30, 2012. (ADAMS Accession No. ML12307A036)
5) Email from T Beltz (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant - Draft Requests for Additional Information re: Extended Power Uprate Steam Dryer Review (TAC MD9990)," [RAIs 42 – 53] dated November 8, 2012.

A001
NRR

6) Email from T Beltz (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant - Draft Requests for Additional Information re: Extended Power Uprate Steam Dryer Review (TAC MD9990)," [RAIs 54 – 67] dated December 13, 2012.
7) Email from K Feintuch (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant - Draft Requests for Additional Information re: Extended Power Uprate Steam Dryer Review (TAC MD9990)," [RAI 67e] dated December 17, 2012. (ADAMS Accession No. ML12353A053)
8) Email from T Beltz (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant - Draft Requests for Additional Information re: Extended Power Uprate Steam Dryer Review (TAC MD9990)," [RAIs 68 – 80] dated January 4, 2013.
9) Letter from T Beltz (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant - Draft Requests for Additional Information re: Extended Power Uprate Steam Dryer Review (TAC MD9990)," [RAIs 81 – 84] dated January 16, 2013.

Pursuant to 10 CFR 50.90, the Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, requested in Reference 1 an amendment to the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License (OL) and Technical Specifications (TS) to increase the maximum authorized power level from 1775 megawatts thermal (MWt) to 2004 MWt.

In Reference 2 NSPM provided a supplement to Reference 1 to provide detailed design and analysis results for a replacement steam dryer (RSD) for MNGP. Reference 3 was provided to correct reactor internal pressure differential information provided in Reference 2.

In References 5, 6, 7, 8 and 9 the NRC provided NSPM draft requests for additional information (RAIs). Conference calls regarding these draft RAIs were held on December 4, 2012, January 18, 2013 and February 19, 2013.

The purpose of this letter is to provide the NRC with responses to the EPU-EMCB-RSD-RAI-47, 49, 51(b), 53, 55, 56, 57, 58, 61, 62, 66, 71, 73, 77, 78 and 80. This is the third in a series of letters that will provide responses to all the NRC RAIs included in References 5 through 9.

Enclosure 1 contains Westinghouse Electric Company, LLC (WEC) letter LTR-A&SA-13-6, P-Attachment, "Monticello Replacement Steam Dryer RAI Responses for Acoustic/Structural Analyses Set #3," dated March 4, 2013. Enclosure 1 provides responses to RAIs 47, 49, 51(b), 53, 55, 56, 57, 58, 61, 62, 66, 71, 73, 77, 78 and 80. Enclosure 1 contains proprietary information.

Enclosure 2 contains WEC letter LTR-A&SA-13-6, NP-Attachment, "Monticello Replacement Steam Dryer RAI Responses for Acoustic/Structural Analyses Set #3," dated March 4, 2013. This is a non-proprietary version of the responses provided in Enclosure 1.

Enclosure 3 contains a WEC affidavit executed to support withholding Enclosure 1 from public disclosure. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). NSPM requests that the proprietary information in Enclosure 1 be withheld from public disclosure in accordance with 10 CFR 2.390(a)4, as authorized by 10 CFR 9.17(a)4. Accordingly, it is respectfully requested that the information which is proprietary to WEC be withheld from public disclosure in accordance with 10 CFR 2.390.

Correspondence with respect to the copyright or proprietary aspects of WEC information or the supporting WEC affidavit in Enclosure 3 should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

The RAI responses provided herein do not change the conclusions of the No Significant Hazards Consideration and the Environmental Consideration evaluations provided in Reference 1 as revised by References 3 and 4.

In accordance with 10 CFR 50.91(b), a copy of this application supplement, without enclosures is being provided to the designated Minnesota Official.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 18, 2013

Mark A. Schimmel
Site Vice-President
Monticello Nuclear Generating Plant
Northern States Power Company-Minnesota

Enclosures (3)

cc: Administrator, Region III, USNRC (w/o enclosures)
Project Manager, Monticello Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC (w/o enclosures)
Minnesota Department of Commerce (w/o enclosures)

ENCLOSURE 2

WESTINGHOUSE LETTER, LTR-A&SA-13-6, NP-ATTACHMENT
MONTICELLO REPLACEMENT STEAM DRYER
RAI RESPONSES FOR ACOUSTIC/STRUCTURAL ANALYSES SET #3

This Enclosure covers the following NRC Requests for Additional Information:

1) MNGP EPU-EMCB-RSD-47
2) MNGP EPU-EMCB-RSD-49
3) MNGP EPU-EMCB-RSD-51(b)
4) MNGP EPU-EMCB-RSD-53
5) MNGP EPU-EMCB-RSD-55
6) MNGP EPU-EMCB-RSD-56
7) MNGP EPU-EMCB-RSD-57
8) MNGP EPU-EMCB-RSD-58
9) MNGP EPU-EMCB-RSD-61
10) MNGP EPU-EMCB-RSD-62
11) MNGP EPU-EMCB-RSD-66
12) MNGP EPU-EMCB-RSD-71
13) MNGP EPU-EMCB-RSD-73
14) MNGP EPU-EMCB-RSD-77
15) MNGP EPU-EMCB-RSD-78
16) MNGP EPU-EMCB-RSD-80

29 pages follow

LTR-A&SA-13-6 NP-Attachment

Monticello Replacement Steam Dryer

RAI Responses

for

Acoustic/Structural Analyses Set #3

March 4, 2013

Westinghouse Electric Company LLC
1000 Westinghouse Drive
Cranberry Township, PA 16066 USA

Monticello Replacement Steam Dryer
RAI Responses for Acoustic/Structural Analyses Set #3

MNGP EPU-EMCB-RSD-RAI-47

On Page 3-14 of WCAP-17540-P, referring to 18 Hz pressure peak, it is stated that, [

]a, c

Response

The 18 Hz peak is present in [

]a, c

MNGP EPU-EMCB-RSD-RAI-49

The flow channels between the outer hood panels and the RPV in the Monticello RSD (Nordic design) appear substantially [

]a, c

(a) [

]a, c

(b) [

]a, c

Response

[

]a, c

a, b

Figure RAI-49-1 [**]a, c**

[

]a, c

[

]a, c

[ ] a, b

Figure RAI-49-2 Velocity Field for the OEM (left) and RSD (right) – Vertical plane through MSL

[ ] a, b

Figure RAI-49-3 Velocity Field for the OEM (left) and RSD (right) – Vertical plane through MSL

[ ] a, b

Figure RAI-49-4 Velocity Field for the OEM (left) and RSD (right) – Horizontal plane at the top of the outer hood

MNGP EPU-EMCB-RSD-RAI-51 (b)

b) Provide the location of the maximum differential acoustic pressure for each panel.

Response

Figures RAI-51-1 to RAI-51-4 present the RMS differential acoustic pressures across the replacement steam dryer structures, obtained with ACE Revision 1.0. The location of the maximum RMS pressure for each MSL-quadrant is indicated with a black 'x'. Updated RMS differential acoustic pressures across the replacement steam dryer structures obtained with ACE Revision 2.0 are presented in Figures 4-5 and 4-6 in Revision 3 of WCAP-17252-P.

a, b

Figure RAI-51-1 Acoustic Differential RMS Pressure across the Steam Dryer Surfaces at CLTP (facing MSLs A/B)

a, b

Figure RAI-51-2 Acoustic Differential RMS Pressure across the Steam Dryer Surfaces at CLTP (facing MSLs C/D)

a, b

Figure 51-3 Acoustic Differential RMS Pressure across the Steam Dryer Surfaces at EPU (facing MSLs A/B)

[ ] a, b

Figure 51-4 Acoustic Differential RMS Pressure across the Steam Dryer Surfaces at EPU (facing MSLs C/D)

MNGP EPU-EMCB-RSD-RAI-53

[

]a, c

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-55

The licensee is requested to describe the Quality Control process utilized to confirm that the finite element model of the MNGP replacement dryer correctly represents the as-fabricated dryer in terms of geometry, dimensions, weld locations, and nodal connectivity.

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-56 (a, b, c, d)

In Section 2.2.3 of the WCAP-17549-P report, the licensee refers to Section 7 of Reference 3, "BWRVIP-182: BWR Vessel and Internal Project, Guidance for Demonstration of Steam Dryer Integrity for Power Uprate," and provides stress concentration factors (SCFs) for fillet welds and full penetration welds. The staff requests the following additional information:

(a) Please explain how the SCFs are applied in fatigue evaluation of the steam dryer welds.

Response

[

]a, c

[

]a, c

(b) Section 7 of BWRVIP-182 requires that the licensee shall provide justification for the SCFs applied in the steam dryer analysis.

[

]a, c

Response

[

]a, c

[

]a, c

(c) Please explain whether there are any undersized fillet welds (that is, toe size smaller than the smaller thickness of the connected plates) present in the fabricated dryer. If present, describe how the undersize effect is accounted for in the fatigue analysis of the weld.

Response

[ ]a, c

(d) Based on a review of the design drawing for the fabricated MNGP dryer, confirm whether there are any partial penetration welds. If partial penetration welds are present, describe the SCF for such welds.

Response

[

]a, c

a, b

Figure 56a Dryer Weld between the Skirt and Flange

a, b

Figure 56b Dryer Weld between the Vane Bank Lower Structure and Trough Top Edge (at Azimuth 315°)

a, b

Figure 56c Dryer Weld between the Vane Bank Lower Structure and Trough Top Edge (at Azimuth 315°)

[ ] a, b

Figure 56d Dryer Weld between the Vane Bank Lower Structure and Trough Top Edge (at Azimuth 45°)

MNGP EPU-EMCB-RSD-RAI-57 (a – i, ii, iii; b – i, ii, iii)

In Section 3.2 of WCAP-17549-P, the licensee describes how the elements with nodes of different number of degrees-of-freedom are attached so that the moments or rotations are transferred from beam element to solid element or from shell element to solid element. The staff requests the following additional information:

(a) [ ]a, c

(i) [ ]a, c

(ii) [ ]a, c

(iii) [ ]a, c

Response

[

]a, c

(b) In Section 3.2.2, the modeling of lifting rod using beam elements and solid elements.

(i) [ ]a, c

(ii) [ ]a, c

(iii) [ ]a, c

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-58

Section 3.2.1 of WCAP-17549-P states the following assumption regarding the vane bank stiffness:

[

]a, c

Please provide justification for this assumption.

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-61

In Section 7.1.1 of WCAP-17549-P, two different sets of boundary conditions are considered in the steam dryer analysis. In each set, two of the vessel lugs located 180-degree apart are constrained in the azimuthal direction. The corresponding stresses are given in Table 8-1.

Please explain how the stresses would have been changed if the constrained vessel lugs were 90-degree apart instead of 180-degree apart, or describe why it is not plausible.

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-62

In Section 8.3.1 of WCAP-17549-P, ASME Code fatigue strength reduction factor (FSRF) of [ ]a, c

[

]a, c

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-66 (a, b, c, d)

[

]a, c

(a) [

]a, c

Response

[

]a, c

(b) Explain the nature of the pump tones (Please clarify what the shaft speed, vpfs : fundamental and 5th harmonic tones are).

Response

[

]a, c

[

]a, c

(c) Provide all potential structure-borne transfer paths for the VPF loads to the steam dryer.

Response

[

]a, c

(d) Establish a conservative means of estimating [

]a, c

Response

[

]a, c

7. [

]a, c

MNGP EPU-EMCB-RSD-RAI-71

Coherence Filtering and Attenuation
Please clarify [

]a, c

Response

[

]a, c

[ ] a, b

Figure RAI-71-1 MSL Strain Gauge Attenuation 0–100Hz

MNGP EPU-EMCB-RSD-RAI-73 (a, b, c)

Strain Correction Factor (SCF)

Please provide the following information:

(a) [ ]a, c

(b) [ ]a, c

(c) [ ]a, c

Response

See the response to MNGP EPU-EMCB-RSD-RAI-64 for details [

]a, c

MNGP EPU-EMCB-RSD-RAI-77 (a, b, c)

FEM Modal Uncertainty

Table 3.7 of WCAP-17540-P includes an uncertainty value of 2.17 associated with FEM modal response.

Please provide the following information:

(a) [

]a, c

Response

[

]a, c

(b) [

]a, c

Response

[

]a, c

c) The dynamic analysis of the dryer does not include the uncertainty in the frequency response functions, which are generally estimated by performing shaker tests. The purpose of Audit Action Item 6 (Enclosure 1 to L-MT-12-056) was to estimate this error, [

]a, c

[

]a, c

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-78

Finite Element Mesh Convergence Error

Audit Action Item 5 requests for the mesh convergence error in displacement and stresses, [

]a, c

Response

[

]a, c

MNGP EPU-EMCB-RSD-RAI-80

[

]a, c

Please provide the following information:

(a) [

]a, c

(b) [

]a, c

Response

[

]a, c

a, b

Figure RAI-80-1 Comparison of Plant Derived MSL Pressure Data, Raw and Processed with Wavelet Denoising, 100% CLTP

[ ] a, b

Figure RAI-80-2 Comparison of Plant Derived MSL Pressure Data, Raw and Processed with EIC Subtraction, 100% CLTP

ENCLOSURE 3

WESTINGHOUSE AFFIDAVIT FOR WITHHOLDING PROPRIETARY INFORMATION

7 pages follow

Westinghouse

Westinghouse Electric Company
Nuclear Services
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Direct tel: (412) 374-4643
Direct fax: (724) 720-0754
e-mail: greshaja@westinghouse.com
Proj letter: LTR-EP-13-011

CAW-13-3643

March 14, 2013

APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

Subject: LTR-A&SA-13-6 P-Attachment, "Monticello Replacement Steam Dryer RAI Responses for Acoustic/Structural Analyses Set #3" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-13-3643 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Xcel Energy.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference CAW-13-3643, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

Bradley F. Maurer, Manager
ABWR Licensing

Enclosures

CAW-13-3643

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared Bradley F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

Bradley F. Maurer, Manager
ABWR Licensing

Sworn to and subscribed before me
this 14th day of March 2013

Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Anne M. Stegman, Notary Public
Unity Twp., Westmoreland County
My Commission Expires Aug. 7, 2016
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

(1) I am Manager, ABWR Licensing, in Nuclear Services, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.

(2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.

(3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.

(4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.

(i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.

(ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

(a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

(b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.

(c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

(d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.

(e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.

(f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

(a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.

(b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.

(c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

(d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.

(e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.

(f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.

(iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.

(iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.

(v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in LTR-A&SA-13-6 P-Attachment, "Monticello Replacement Steam Dryer RAI Responses for Acoustic/Structural Analyses Set #3" (Proprietary), dated March 4, 2013, for submittal to the Commission, being transmitted by Xcel Energy letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the Monticello Replacement Steam Dryer Project, and may be used only for that purpose.

This information is part of that which will enable Westinghouse to:

(a) Provide responses to NRC RAIs regarding Monticello RSD acoustic/structural analyses.

Further this information has substantial commercial value as follows:

(a) Westinghouse plans to sell the use of the information to its customers for the purpose of the Monticello Replacement Steam Dryer Project.

(b) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

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