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Fitzpatrick Nuclear Power Plant

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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10 CFR 2.206 PETITION REVIEW BOARD (PRB)

CONFERENCE CALL

RE

FITZPATRICK NUCLEAR POWER PLANT

+ + + + +

WEDNESDAY

NOVEMBER 13, 2013

+ + + + +

The conference call was held, Ho K. Nieh, Jr., Chairperson of the Petition Review Board, presiding.

PETITIONER: DAVID LOCHBAUM

PETITION REVIEW BOARD MEMBERS

HO K. NIEH, JR., Director, Division of Regional Support

MOHAN THADANI, Petition Manager for 2.206 petition

JOSEPH GILLMAN, Office of General Counsel

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NRC HEADQUARTERS STAFF
ROBERT BEALL, Branch Chief, DORL, NRR
MERRILEE J. BANIC, Petition Coordinator, NRR
CARRIE KAVANAGH, NRO
MATTHEW YODER, Chemical Engineering Branch, Division
of Engineering, NRR

NRC REGION I OFFICE
STEVE SHAFFER

ALSO PRESENT
CHRIS ADNER, Licensing Manager, FitzPatrick Nuclear
Power Plant
JESSICA AZULAY, Alliance for a Green Economy
TIM JUDSON, Citizens Awareness Network

P R O C E E D I N G S

1:32 p.m.

1
2
3 MR. THADANI: I would like to thank
4 everybody for attending this meeting. My name is
5 Mohan Thadani, and I'm the NRC's Senior Project
6 Manager assigned to FitzPatrick Plant. We are here
7 today to allow Petitioner, Mr. David Lochbaum, to
8 address the Petition Review Board regarding a 10 CFR
9 2.206 petition dated July 25, 2013, filed by him on
10 behalf of Alliance for a Green Economy, Beyond
11 Nuclear, Citizens Awareness, and the Union of
12 Concerned Scientists. I'm the petition manager for
13 this petition; the Petition Review Board chairman is
14 Mr. Ho Nieh, Director, Division of Inspections and
15 Regional Support, Office of Nuclear Reactor
16 Regulation.

17 This teleconference is scheduled from 1:30
18 p.m. to 2:30 p.m. Eastern time; the meeting is being
19 recorded by the NRC Operations Center, and will be
20 transcribed by a court reporter. The transcript will
21 become a supplement to the petition; the transcript
22 will also be made publicly available and will be the
23 PRB's meeting summary. I'd like to open this meeting
24 with introductions. In our room here today, I will go
25 on my left.

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1 MR. BEALL: This is Robert Beall, Acting
2 Branch Chief, DORL, NRR.

3 MS. KAVANAGH: Kerri Kavanagh, I'm the
4 Chief of the Quality Assurance Vendor Inspection
5 Branch, Office of New Reactors.

6 MR. YODER: Matt Yoder, NRR Division of
7 Engineering, Chemical Engineering Branch.

8 CHAIRMAN NIEH: Ho Nieh, Director,
9 Division of Inspection and Regional Support.

10 MS. BANIC: Lee Banic, Position
11 Coordinator, NRR.

12 MR. GILLMAN: Joe Gillman, Office of the
13 General Counsel.

14 MR. THADANI: We have completed
15 introductions at NRC Headquarters, and I would now
16 request those who are on the phones, please identify
17 yourself.

18 MR. LOCHBAUM: This is David Lochbaum,
19 Director of the Nuclear Safety Project for the Union
20 of Concerned Scientists.

21 MR. ADNER: This is also Chris Adner, the
22 Licensing Manager at the FitzPatrick Nuclear Power
23 Plant.

24 MR. KORS: This is Ken Kors, Licensing,
25 FitzPatrick Nuclear Power Plant.

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1 MS. AZULAY: This is Jessica Azulay, Staff
2 Organizer with Alliance for a Green Economy.

3 MR. THADANI: Is that everybody? I'd like
4 to emphasize that we each need to speak clearly and
5 loudly to make sure that the conversation is
6 accurately recorded and subsequently correctly
7 transcribed. If you do have something that you would
8 like to say, please first state your name for the
9 record. For those dialing in the meeting, please
10 remember to mute your phone to minimize the background
11 and distractions. If you do not have mute button,
12 this can be done by pressing star 6; to unmute, press
13 star 6 again. At this time, I'll turn the meeting
14 over PRB Chairman, Mr. Ho Nieh.

15 CHAIRMAN NIEH: Thank you, Mohan. This is
16 Ho Nieh, the Chair of the Petition Review Board.
17 Hello, Dave and Jessica; thank you for taking the time
18 today to discuss your petition with the PRB, and also
19 good afternoon to I think Chris and Ken from the
20 FitzPatrick Station. Today, we're going to discuss
21 the 2.206 petition that was submitted by Mr. Dave
22 Lochbaum on behalf of the Alliance for a Green
23 Economy, Beyond Nuclear, Citizens Awareness Network,
24 and the Union of Concerned Scientists. Before we get
25 into the details of the petition, I would like to

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1 provide a brief overview of, and some background on
2 the 2.206 petition process, which is in Title 10 of
3 the Code of Federal Regulations.

4 This process is a public process in which
5 any member of the public can petition the NRC to take
6 an enforcement type action related to an NRC licensee
7 or a licensed activities. Depending on the results of
8 the NRC's evaluation of these petitions, and
9 consistent with the NRC's safety mission, the NRC
10 could modify, suspend or revoke an NRC-issued license
11 or take any other appropriate enforcement action to
12 resolve a safety issue at an NRC-licensed facility.

13 The NRC conducts its review of 2.206 petitions in
14 accordance with the guidance in Management Directive
15 8.11, and that is a publicly available document if you
16 would like to take a look at that.

17 The purpose of today's teleconference is
18 to allow the petitioners an opportunity to provide any
19 additional explanation or support for the petition
20 that they have submitted so the PRB can consider that
21 in its evaluation. I do want to note that this
22 meeting is not hearing nor is it an opportunity for
23 the petitioners to question or examine the PRB on the
24 merits of the issues in the request, and the Petition
25 Review Board, or PRB, will not be making a decision on

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1 the merits of the petition at this meeting.

2 Following this meeting, the Petition
3 Review Board will conduct an internal deliberation on
4 whether the petition meets the criteria for review,
5 and again, those criteria are presented in Management
6 Directive 8.11. And once that decision is made, the
7 NRC will inform the petitioner of the decision. A
8 typical Petition Review Board at the NRC consists of a
9 chairman usually, and a senior executive service
10 manager. It also has a petition manager and a
11 Petition Review Board coordinator, and the NRC also
12 brings in other members of the NRC staff to support
13 the review, and that's based on the specific content
14 of the petition that was submitted.

15 As described in our process, the NRC staff
16 during this call may ask clarifying questions in order
17 to better understand the petition and the information
18 presented to the NRC staff today, and again, that's
19 done with the goal of reaching a decision on whether
20 to accept or reject the petitioner's request for
21 review under the 10 CFR 2.206 petition process. I'll
22 give you just a brief summary of the petition. In the
23 petition request dated July 23, 2013, Mr. Lochbaum
24 requested that the NRC take enforcement action by
25 imposing an Order of regulatory requirement that the

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1 condenser tubes at the FitzPatrick Plant be replaced
2 prior to the reactor restarting after the Fall 2014
3 refueling outage.

4 Before I turn the meeting over to Mr.
5 Lochbaum, I would like to remind those on the phone
6 again to please mute your phones to minimize any
7 background noise. In addition, since the call is
8 being recorded and transcribed, if you are speaking,
9 please identify yourself so the court reporter can
10 properly document your statement. So at this time,
11 I'd like to turn the meeting over to Dave Lochbaum.
12 Dave, you have the floor.

13 MR. LOCHBAUM: Thank you. This is Dave
14 Lochbaum. I appreciate this opportunity to appear
15 before the Petition Review Board, albeit remotely, at
16 my convenience. I think the petition is fairly clear,
17 and I really requested this opportunity to, as Ho
18 pointed out, answer any clarifying questions if there
19 are any about what we're seeking in the petition or
20 why we're seeking it. So it's really an opportunity
21 to provide any clarification if it's requested by the
22 NRC staff.

23 I did want to take a moment to highlight a
24 couple of portions in the petition; they both appear
25 on page 5 of the petition. Towards the top of that

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1 page, we extracted a quote from an NRC inspection
2 report dated April 23, 2013, where the NRC inspection
3 report mentions Entergy's plans to replace the
4 condenser tubes during the Fall 2014 refueling outage.

5 So we think--we cited that because that is the
6 company's plan; it seems to be reasonable, or the
7 request that we're asking is not unreasonable because
8 the company's already announced its plans to do that.

9 All we're trying to do is to kind of highlight it by
10 the next paragraph, where we talk about the NRC
11 issuing a confirmatory order on July 1, 2013 to the
12 Occonee licensee, basically requiring some previously
13 committed to items be completed by a certain date, a
14 specified date, which basically turned a commitment or
15 a promise into a more enforceable regulatory
16 requirement.

17 That same kind of regulatory footprint or
18 regulatory leverage is what we're seeking with the
19 company's plans to replace the condenser tubes at
20 FitzPatrick; basically to have the NRC issue some kind
21 of regulatory requirement, order, amendment to the
22 license or whatever it takes to basically do the same
23 thing that was done at Occonee--transform a promise
24 or a commitment into a more legally-enforceable
25 requirement that ensures that it happens.

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1 That would not preclude the licensee from
2 changing that date and going past the Fall of 2014,
3 but it would entail prior NRC review and approval for
4 that to happen, whereas a commitment could be revised
5 and extended much more readily. So that's what we're
6 seeking in the petition is to basically make that
7 current plan more of a legally-enforceable
8 requirement. With that, I'd be glad to entertain any
9 questions, clarifying questions about the petition or
10 anything in the petition, if there are any.

11 CHAIRMAN NIEH: Okay, thank you, Dave.
12 I'll--maybe I'll offer the opportunity for anybody
13 from the NRC staff here that has any questions? No
14 questions? Mohan, please.

15 MR. THADANI: We don't have anything
16 specific to ask now, but we do reserve the right to
17 ask in the future, when we do some further reviews.

18 MR. LOCHBAUM: Okay, fair enough, but I'd
19 be glad to provide any information at any time now or
20 down the road, so just let me know if I can help in
21 any way.

22 CHAIRMAN NIEH: No I'm sorry, this is Ho.
23 I did have a question, but I believe Jessica, if you
24 have something to add, please do.

25 MS. AZULAY: Yes, this is Jessica. I

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1 believe my colleague, Tim Judson from CAN is on the
2 phone, and I wanted to give him an opportunity to
3 speak first.

4 CHAIRMAN NIEH: Okay. Tim, are you on the
5 line there?

6 MR. JUDSON: I am, I am. Sorry I called
7 in a few minutes late. And thanks to Jessica for
8 giving me the time and thanks to the Petition Review
9 Board for letting us comment today. So I just wanted
10 to be able to put the issue of the FitzPatrick
11 condenser into a larger context, which we're very
12 concerned about, you know, the trajectory that this
13 reactor is headed down. We are--a number of the
14 petitioners in this proceeding are also involved in a
15 separate 2.206 proceeding regarding the financial
16 qualifications of Entergy to continue operating
17 FitzPatrick, and this particular issue of the
18 unplanned power changes and the role of the condenser
19 in that has been a central issue of evidence in that
20 petition regarding Entergy's financial condition and
21 their desire--their cutting costs on safety-related
22 maintenance issues at the plant.

23 And we really think that this is an
24 important issue for NRC to deal with as an individual
25 item as a way to mitigate the broader safety concerns

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1 that may arise in the financial environment that
2 operators like Entergy, and particularly FitzPatrick,
3 are operating in. As an example of that, one of the
4 concerns that's come up most recently with respect to
5 these issues has been a concern about how NRC is
6 evaluating cost-benefit analyses regarding the sort
7 of--in relation to the financial condition that
8 operators are--that licensees find themselves in.

9 In particular, there was a report by UBS
10 Investment Research in February of this year, having
11 met with NRC regarding the concern of particularly
12 Entergy's reactors in the markets that they're
13 operating in. And they made a very concerning comment
14 about how NRC made the decision not to require filters
15 on hardened vents for Mark I BWRs, and in particular
16 they mentioned that there was a concern by NRC about
17 the impact of requiring safety upgrades in the
18 financial condition that they're operating their
19 reactors in. More particularly, I mean clearly that
20 the requiring--that issuing safety requirements may
21 cause certain reactors to go out of business, or at
22 least be an additional burden on their continued
23 operations.

24 We would be very concerned about NRC
25 deferring action on an item like the condenser, both

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1 because it clearly has resulted in a safety impact vis
2 a vis the white rating under the unplanned power
3 changes indicator, and this is precisely the sort of
4 thing that NRC needs to be able to take action on in
5 order to protect safety standards within the economic
6 context like those licensees like Entergy are finding
7 themselves in. One additional concern with respect to
8 how this is playing out at FitzPatrick, what is
9 Entergy's defiance about its plans regarding the
10 continued operation of FitzPatrick.

11 You know, we know that the plan as Entergy
12 has suggested it has been to replace the condenser
13 tubes at FitzPatrick at an extra fueling outage, which
14 would occur next October, but it's also increasingly—
15 because Entergy has indicated increasing uncertainty
16 as to whether they will actually conduct that
17 refueling outage, or take FitzPatrick into a shut down
18 condition. And, in particular, at a state Senate
19 hearing in early October, an Entergy representative
20 said that the continued operation of FitzPatrick past
21 the Fall of 2014 refueling is an item that they "have
22 to review on a routine basis at this point."

23 And we realize that the issue of the
24 condenser is very much hung up in this, because
25 Entergy is going to need to plan for the capital

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1 investment and order the equipment necessary to
2 conduct such a replacement at that time, and the fact
3 that the reactor is continuing to have unplanned power
4 changes as a result of the condenser and presenting an
5 ongoing safety concern in the meantime very much
6 underlines the need for NRC to act on this issue. So
7 with that, I'll close my comments and cede the floor
8 to Jessica. Thanks.

9 MS. AZULAY: Thank you, Tim. So again, my
10 name is Jessica Azulay, I'm a staff organizer for
11 Alliance for a Green Economy; I'm calling in from
12 Syracuse, New York today. And I just wanted to let
13 you all know a little bit about Alliance for a Green
14 Economy. We're a coalition of environmental and
15 social justice organizations based in New York State,
16 and our member organizations are the Atlantic Chapter
17 of the Sierra Club, Peace Action New York State,
18 Center for Health, Environment and Justice, Citizens
19 Environmental Coalition, Central New York Citizens
20 Awareness Network, Peace Action of Central New York
21 and the Syracuse Peace Council. So as you can see,
22 together our member groups represent tens of thousands
23 of New Yorkers concerned about nuclear safety, and
24 many live in the region surrounding the FitzPatrick
25 reactor.

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1 For more than a year, we've been concerned
2 about the increasing number of unplanned power changes
3 at FitzPatrick. In the fourth quarter of last year,
4 the plant exceeded the green-white threshold for
5 unplanned power changes; but even before that, it was
6 already seeing an above-average number of these
7 destabilizing events. And since crossing the
8 threshold, FitzPatrick has stayed in the white for
9 unplanned power changes for four quarters now. WE
10 know that not all of these unplanned power changes
11 stem from the condenser issues, but the majority of
12 them do. We know this from reading the quarterly
13 inspection reports and the licensee notes on the
14 Safety Performance Summary.

15 So we joined this petition in order to
16 insure that the NRC will address the underlying cause
17 of the ongoing unplanned power changes at FitzPatrick,
18 and will enforce its quality assurance regulation on
19 the plant by requiring Entergy to replace the tubes in
20 the condenser. These unplanned power changes are
21 destabilizing and they increase the safety risks of
22 running the reactor. Entergy's failure to replace the
23 condenser so far obviously at the end of its reliable
24 life, and which has caused such an elevated number of
25 unplanned power changes for more than a year now is a

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1 threat to our safety. So we're asking NRC to require
2 a true fix to these issues with a clear deadline.

3 For the financial reasons that Tim Judson
4 just laid out, we don't believe Entergy can be relied
5 upon to act decisively in the public interest in this
6 case, or to honor the time line it previously
7 discussed with the NRC. Even though that NRC
8 inspection report that Dave Lochbaum just pointed out,
9 where Entergy stated its plans to replace the tubes in
10 the condenser during next year's refueling outage, we
11 don't believe that Entergy considers this a solid
12 commitment. In an interview with the Syracuse Post
13 Standard about six weeks ago, Bill Mohl, President of
14 Entergy Wholesale Commodities, was reported as saying
15 that Entergy is considering replacing the condenser
16 tubes during the next refueling outage, but he said
17 that no final decision has been made.

18 So it's increasingly unclear, given
19 Entergy's financial situation at FitzPatrick, whether
20 the company will refuel the reactor in 2014 or will
21 close it, and even if Entergy does refuel the reactor
22 in 2014, the plant will still be under economic
23 pressure and at risk of imminent retirement, unless
24 something dramatic shifts in the New York electricity
25 market. With the future of the plant in limbo, and

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1 free cash flow in the negative, it is all the more
2 important that NRC hold Entergy accountable for
3 investing in this vital equipment we all rely on for
4 our protection from a nuclear accident. Without this
5 requirement that we're asking for, it would be all too
6 easy for Entergy to put financial interests above
7 safety, to absorb the hassle of unplanned power
8 changes and increased inspections, while putting off
9 this expensive investment as long as possible.

10 If Entergy does refuel the reactor next
11 year, they cannot be allowed to waffle on replacing
12 the condenser, no matter how expensive or hard it will
13 be for their bottom line. So we're asking that this
14 Petition Review Board consider this petition very
15 seriously and issue the requirement that we're asking
16 for. Thank you.

17 CHAIRMAN NIEH: Okay thank you, Jessica,
18 Tim and Dave. Well in my job as the Petition Review
19 Board Chair--this is Ho Nieh, NRR speaking--you know,
20 we'll insure that the NRC staff thoroughly considers
21 the information submitted in the petition, as well as
22 the information you all presented on the phone today.

23 I do want to point out that--Tim, you mentioned this
24 as well, and Jessica, you touched on this also in your
25 remarks with respect to the financial issues raised in

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1 a separate petition; that is also in the NRC's process
2 here, and there's been a separate board convened to
3 evaluate the information in that petition. So that
4 will be something that we'll remain aware of with
5 respect to what that petition review board is
6 evaluating, but it will likely not be something that
7 we'll consider as part of this petition. But unless
8 there's a reason to join those two together, you know,
9 we'll have to think about that at some point in time
10 in the future. But I do want to separate those two
11 issues, because there are two separate petitions.

12 I did have one question, and Tim and
13 Jessica, your remarks touched on this with respect to
14 the unplanned power changes and the risk to public
15 health and safety, but I would ask also Dave, I was
16 reading the petition before the meeting, and I
17 understand that you're seeking an enforcement action,
18 similar to what we did with Oconee and the
19 modifications they were making to that facility, which
20 basically puts in place a legally-binding requirement
21 to complete the modifications by a certain date in
22 time. And in the petition, it's quoted "While perhaps
23 not posing the same heightened risk to the public as
24 the safety shortcomings at Oconee, the condenser tube
25 degradation at FitzPatrick poses risk to the public."

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1 That was the part I was quoting from the petition.

2 So Dave, let me ask I guess, are there any
3 other issues that you'd like to make the Board aware
4 of with respect to safety risks to the public beyond
5 what was described by Tim and Jessica with the
6 unplanned power changes and the white performance
7 indicator?

8 MR. LOCHBAUM: This is Dave Lochbaum. No,
9 I think to elaborate what was in the petition, the
10 quote you just read from the petition, you know the
11 NRC's ROP used to have the unplanned scrams with
12 complications, where loss of the normal heat sink or
13 the condenser was an initiator, and that was in
14 recognition that while not technically safety grade or
15 relied upon in a safety analysis, if you lose the
16 condenser or the normal heat sink, you're making your
17 life more difficult; you're increasing the risk.

18 And basically, that's what I was alluding
19 to in the petition, is that here there's an
20 identified, well-established problem with the
21 condenser which makes its reliability less than it was
22 if they replaced the condenser tubes. It doesn't--
23 it's not that you're one step away from meltdown, but
24 you are reducing the reliability of the plant the way
25 it's operating. So that's the safety implications to

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1 the public I was inferring from that statement.

2 CHAIRMAN NIEH: Okay, thank you very much,
3 Dave, I appreciate that clarification, and you know
4 when you mentioned that--this is Ho again from NRR--I
5 kind of reflect to my days back as an inspector; in
6 fact, I was at a site not too far away from
7 FitzPatrick, at Ginna, but I do remember that
8 performance indicator scam with loss of normal heat
9 removal. And now finding myself back in this position
10 some 13 years later, things have changed in the
11 performance indicators, and yes you were correct that
12 that indicator is no longer part of the PIs that are
13 voluntarily reported by industry. But Dave, thanks
14 for that clarification and elaboration on that point
15 in your petition. Any other questions from the group
16 here? Okay I think Jessica, did you--were you going
17 to make another comment?

18 MS. AZULAY: Yes, this is Jessica Azulay.
19 I just wanted to respond to the question of the
20 financial qualifications petition and its relationship
21 to this petition. I wanted to clarify that we're not
22 suggesting that these petitions be joined. We do
23 realize that they are separate petitions, and that our
24 financial qualifications petition is in process, and I
25 think I just wanted to clarify that we are bringing

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1 this issue to you today because we do think it has
2 bearing on how the company will--how we can predict
3 the company will act, and whether--and what they're
4 considering and what kind of constraints and pressures
5 they're under in deciding whether to conduct this tube
6 replacement that they've said they're planning to do.

7 And so that's why we wanted to bring
8 these issues to your attention and bring that
9 proceeding to your attention. We believe the company
10 is under a lot of financial pressure to put off this
11 tube replacement as long as possible, which is part of
12 why they've put this tube replacement off so long
13 while these unplanned power changes continue for such
14 a long period of time, and until the company makes a
15 decision about whether it's going to continue
16 operating for a long period of time, we predict they
17 won't want to invest in such an expensive repair and
18 replacement. So that's why we wanted to bring these
19 to your attention, not to suggest that these two
20 petitions should be joined.

21 MR. JUDSON: That's right, and this is
22 Tim, and just to add to that, I think the additional
23 context in which we wanted to raise those issues was
24 with respect to NRC might conduct a cost-benefit
25 analysis in deciding sort of how to provide regulatory

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1 enforcement on this issue in particular, and we would
2 just like to sort of be out there up front, sort of
3 calling attention to our concerns about how NRC might
4 conduct that cost-benefit analysis and what factors it
5 may consider.

6 CHAIRMAN NIEH: Okay, thank you very much,
7 Tim and Jessica for that clarification. The NRC staff
8 here do not have any additional questions, I guess
9 Dave, any final comments for the Board?

10 MR. LOCHBAUM: This is Dave Lochbaum, I
11 just--I should have done it at the opening. I wanted
12 to thank Mohan Thadani for arranging this meeting. We
13 went through a couple of iterations because of the
14 Government shutdown, but he did a fantastic job of
15 setting us up and arranging this, and I appreciate
16 that effort and the extra effort he had to go through
17 because of the Government shutdown that was beyond his
18 control. So I appreciate that.

19 MR. THADANI: Thank you very much.

20 CHAIRMAN NIEH: Okay, thanks for the
21 acknowledgment, Dave. I guess before--so we'll get
22 ready to conclude the meeting. I did want to just
23 clarify one thing I mentioned in my opening remarks.
24 I said the wrong date for the petition; I said July
25 23, but the date of the petition is actually July 25,

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1 so I wanted to clarify that. So before I conclude the
2 meeting, I know we have some members of the public on
3 the phone, I'd like to perhaps take the opportunity
4 here to see if any members of the public have any
5 questions for the NRC on the process, not the merits
6 of the petition we just discussed, but are there any
7 questions from members of the public on the phone
8 about how the NRC dispositions 2.206 petitions?

9 MR. GUNTHER: This is Paul Gunter with
10 Beyond Nuclear; I don't have any questions at this
11 point.

12 CHAIRMAN NIEH: Okay, thank you, Paul.
13 All right, well Mr. Lochbaum--okay, does the licensee
14 have any questions about the NRC's 2.206 petition
15 process?

16 MR. KORS: No, we do not.

17 CHAIRMAN NIEH: Okay, thank you. Thank
18 you, Mohan. Okay, I'd like to--excuse me?

19 MR. KORS: Just giving you my name, Ken
20 Kors.

21 CHAIRMAN NIEH: Oh, okay. Thank you, Ken.
22 Okay, well Dave and Jessica and Tim, thank you for
23 taking the time to talk with the Board today, I found
24 your remarks helpful and we'll consider them in
25 addition to the petition that was submitted on July

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1 25, 2013. And with that, the meeting is adjourned.

2 Thank you.

3 MR. LOCHBAUM: Thank you. Bye.

4 MS. AZULAY: Thank you.

5 [Whereupon, the meeting was concluded at

6 2:02 p.m.]

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