



August 27, 2014
L-2014-243

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555-0001

Re: Turkey Point Unit 3 and Unit 4
Docket Nos. 50-250 and 50-251
Florida Power and Light Company's, Turkey Point Units 3 and 4, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. U.S. Nuclear Regulatory Commission, Order Number EA-12-049, Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (ML12056A045)
2. FPL Letter, L-2013-061, Florida Power and Light Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2013 (ML13072A038)
3. FPL Letter, L-2013-249, Florida Power and Light Company's, Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 21, 2013 (ML13248A311)
4. NRC Letter, Turkey Point Units 3 and 4 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0982 and MF0983), dated February 6, 2014 (ML14002A151)
5. FPL Letter, L-2014-041, Florida Power and Light Company's, Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2014 (ML14073A454)

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On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including Florida Power and Light Company's (FPL) Turkey Point Units 3 and 4. In Reference 2, FPL submitted an Overall Integrated Plan for the implementation of this Order. The Order required Licensee's to provide periodic status reports for the Overall Integrated Plan.

FPL submitted the first six-month update to the Overall Integrated Plan on August 21, 2013 (Reference 3). On February 6, 2014, the NRC Staff provided the interim staff evaluation and audit report including open and confirmatory items (Reference 4). On February 26, 2014, FPL submitted the second six-month update to the Overall Integrated Plan (Reference 5).

The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1.

The enclosure to this letter provides an update of milestone accomplishments, confirmatory items and open items, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Turkey Point Licensing Manager, at 305-246-7327.

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

Executed on August 27, 2014

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

Sincerely,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

L-2014-243

Enclosure

Florida Power and Light Company's

Turkey Point Units 3 and 4

Third Six Month Status Report for the Implementation of Order EA-12-049

Order Modifying Licenses with Regard to Requirements for Mitigation

Strategies for Beyond-Design-Basis External Events

1 Introduction

Florida Power and Light Company's (FPL) Turkey Point developed an Overall Integrated Plan (OIP) (Reference 2 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 1. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

Since the last 6 month update, significant progress has been made in performing the analysis supporting FLEX strategies which are currently on track for completion by the Milestone date shown below. Specifically, the RCS thermal hydraulic response (RETRAN-3D) during an ELAP and LUHS is in final design verification review; and the results support the core cooling mitigation strategies. Detailed design for mechanical and electrical tie-in modifications is progressing. Implementation of Unit 3 modifications has been started. Additionally, the following activities have started with some substantially developed: development of the staffing analysis, design for modifications on the lag unit (Unit 4), ordering of equipment (procurement Phases 2/3), procedures and training.

3 Milestone Schedule Status

The following provides an update to Attachment 3 of the Overall Integrated Plan (Reference 1). It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The target completion dates have been adjusted for the following milestones:

- Milestones:
 - Analyses supporting FLEX strategies,
 - Final time constraint validations,
 - Staffing analysis (Phase 2),
 - Final walkthrough validation,
 - Issuance of modification packages for Unit 3,
 - Receipt of equipment (procurement phase 1),
 - Issuance of Operations procedure changes including FSGs,
 - Creation of Maintenance procedures,
 - Procedure changes training material,
 - The Training plan, and
 - Completion of Training

BASIS: During the detailed design of the FLEX modifications the need arose to refine some of the strategies. Some of these refinements resulted in a reforecast of the associated milestone dates. However, these revised milestone target completion dates do not impact Turkey Point's ability to meet the final compliance date for NRC Order EA-12-049 implementation and are expected to support the NRC's final audit, 4 – 6 months prior to the compliance dates.

New Milestones:

- There are no new milestones

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Complete	N/A
Update 3	Aug 2014	Complete	N/A
Update 4	Feb 2015	Not Started	N/A
Update 5	Aug 2015	Not Started	N/A
Update 6	Feb 2016	Not Started	N/A
Update 7	Aug 2016	Not Started	N/A
Walk-through or Demonstrations:			
Complete Analyses Supporting FLEX Strategies	Jun-2014	Started	Jan-2015
Complete Final Time Constraint Validations	Nov-2014	Not Started	March-2015
Complete Staffing Analysis (Phase 2)	Jan-2015	Started	June-2015
Complete Final Walkthrough Validation	Feb-2015	Not Started	April-2015
Modifications:			
Issue Modification Packages for Unit 3	Jun-2014	Started	March-2015
Unit 3 Implementation Complete	Nov-2015	Started	N/A
Issue Modification Packages for Unit 4	Jun-2015	Started	N/A
Unit 4 Implementation Complete	May-2016	Not Started	N/A
Storage:			
FLEX Storage Building Completed	Mar-2015	Started	N/A
FLEX Equipment:			
Order Equipment (procurement phase 1)*	Jun-2014	Complete	N/A
Receive Equipment (procurement phase 1)*	Dec-2014	Not Started	Feb-2015
Order Equipment (procurement phases 2/3)*	Dec-2014	Started	N/A
Receive Equipment (procurement phase 2)*	June-2015	Not Started	N/A
Receive Equipment (procurement phase 3)*	June-2015	Not Started	N/A
Develop Strategies (Playbook) with RRC	Jan-2015	Started	N/A
Procedures:			

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Issue Operations Procedure Changes including FSGs	Sep-2014	Started	June-2015
Create Maintenance Procedures	Dec-2014	Not Started	June-2015
Training:			
Operations Procedure Changes Training Material Complete	Sep-2014	Started	Feb-2015
Develop Training Plan	Oct-2014	Started	March-2015
Training Complete	Feb-2015	Started	June-2015

*Note phase refers to the procurement sequence of equipment to be ordered, not the FLEX Phases as described in NEI 12-06.

4 Changes to Compliance Method

4.1 Changes to Modifications

Battery Backup for Monitoring of Essential Instrumentation & FLEX Portable Diesel Generator to Repower Vital 208/120 VAC Panels.

Industry discussions are ongoing for NEI 12-06 requirement 3.2.1.10 regarding Battery Backup for Monitoring of Essential Instrumentation. Turkey Point is planning a related modification to address this requirement. Details of the conceptual design and drawings will be provided with the next six month update.

The battery backup portion of this planned modification would provide the capability to obtain indications of the Essential Monitoring Instrumentation during an event within the Emergency Operating Procedures and FLEX Support Guidelines in order to comply with NEI 12-06 requirement 3.2.1.10.

The initial plant conditions stated in NEI 12-06 section 3.2.1.3 are a beyond design basis external event (BDBEE) that may cause the loss of off-site power, emergency diesel generators, and any alternate AC sources. Baseline coping capabilities will include small AC and/or DC power sources to recharge batteries or energize key equipment and instrumentation. This modification would provide the capability to obtain indication of the Essential Monitoring Instrumentation by connecting Uninterruptible Power Supply (UPS) and guidance for portable instruments readings (e.g. Fluke meters) to provide defense-in-depth in monitoring of key safety parameters. This will facilitate Operational decisions for managing the response to the event within the EOP, FSG, and SAMG procedures.

The modification will install new receptacles that can be used for locally powering the Essential Monitoring Instruments loops. The EOP and FSG procedures provide the procedural controls for the connection of the receptacles to the UPS systems. In addition, portable meters will be used to obtain local indications of certain parameters.

4.2 Changes to Strategies

The following represents clarifications to Turkey Point's FLEX coping strategy for Maintain Core Cooling and Heat Removal Phase 2 (OIP pages 21-22) and Portable Equipment Phase 2 (OIP pages 61 – 62). The phase 2 coping strategy following an ELAP and LUHS event continues to rely on the use of 480 VAC portable diesel generators (PDGs) to power select electrical loads; including station battery chargers. Part of this strategy includes installation of receptacles (via Modification 13) for repowering the vital 208/120VAC panels. As discussed in the Enclosure to Reference 1, the coping strategy for maintaining core cooling and heat removal varies depending upon whether or not the precipitating event is a hurricane. During a hurricane event a high wind condition may exist for an extended period of time and prevent deployment of 480VAC PDGs within the 8 hours assumed in the base (non-hurricane scenario) timeline. To facilitate coping with the hurricane conditions (consistent with NEI 12-06 para 3.2.1.7) a separate, small diesel generator will be pre-staged in a location protected from the hurricane specific external conditions. This generator will be used to power the vital 208/120VAC panels as an intermediate coping strategy for recovery from the hurricane event timeline. Use of this power source is only required until the 480VAC PDGs are available for deployment following the extended wind condition. Use of the small diesel generator is an interim activity that is considered to be an enhancement to the existing coping strategies for repowering of the vital DC loads during the transition phase.

The coping strategy for a hurricane induced ELAP and LUHS event (as discussed in the Enclosure to Reference 1 and plant procedures) is:

1. Shutdown the reactor and cooldown to modes 3, 4 or 5 (specific mode depends on the projected strength of the hurricane) at least 2 hours prior to the onset of projected hurricane force winds on site. Remain in this condition until it is safe to return to power and reliable off-site power to the site has been restored
2. fill both CSTs to maximum level (prior to the onset of projected hurricane force winds on site)
3. lock in the steam supply for the AFW FCVs (prior to the onset of projected hurricane force winds on site)

After landfall and high winds have subsided sufficiently to allow full plant access:

1. manually operate the AFW FCVs as necessary
2. establish CST makeup from the well
3. establish a secondary SG injection path
4. power the 480 V load centers with the PDG (this action was not previously noted in the Reference 1 Enclosure)

As noted above, the RCS will be cooled down to Modes 3, 4 or 5 (depending on the projected hurricane strength) a minimum of 2 hours prior to hurricane force winds reaching the plant site. Under this condition the inventory of a single CST will be sufficient to cope with an ELAP/LUHS event for approximately 24 hours, by which time AC power, CST makeup, secondary SG makeup, RCS makeup and SFP makeup will have been established. The hurricane specific timetable has also been supported by the results of the RCS thermal hydraulic response (RETRAN-3D) developed specifically for Turkey Point.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Turkey Point expects no need for relief/relaxation to Order EA-12-049 requirements and will meet the final implementation dates for both units.

6 Pending Actions from Overall Integrated Plan and NRC Interim Staff Evaluation Open Items

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the draft Safety Evaluation (SE) and the status of each item. Resolution of these items will not affect the schedule for completing implementation of the Order's requirements.

No.	Overall Integrated Plan Open Item (Pending Actions)	Target Completion Date	Status
1	Perform a revised analysis of the containment structure once the detailed performance parameters for the shutdown seals are obtained and using more realistic heat input parameters.	N/A	Started (Being tracked as NRC Confirmatory Item 3.2.1.6.A)
2	A hydraulic analysis will be performed to determine the minimum requirements of the portable FLEX pumps and connection point sizes. The outputs of this analysis will include a minimum flow and discharge pressure for each pump.	N/A	Started (Being tracked as NRC Confirmatory Item 3.2.1.9.B)
3	A hydraulic analysis will be performed to support the ability to heat up from Mode 5 to a condition where the AFW pumps are removing decay heat via the SGs.	January 2015	Started
4	Heat loads will be removed via the SFP Cooling heat exchangers, RHR heat exchangers, and Containment Coolers. Analysis will be required to determine the minimum requirements for UHS RRC pump.	November 2014	Started
5	Analysis will be required to determine fuel requirements of FLEX equipment. This analysis will determine requirements and capabilities of onsite FLEX portable pumps and diesel generators for Phase 2.	N/A	Started (Being tracked as NRC Confirmatory Item 3.2.4.9.A)
6	A determination of the "drop off" location from the RRC is pending. Once selected, the path to the site will be reviewed.	N/A	Started (Being tracked as NRC Confirmatory Item 3.1.1.4.A)
7	An analysis will be performed to establish the timeline for SI or RWST injection for Modes 5 & 6	January 2015	Started
8	Complete a final assessment of haul paths and staging areas to confirm access including review for soil liquefaction	March 2015	Started
9	Generic WCAP guidance recommends that a site-specific evaluation be performed once the seal design is completed to validate that the cooldown and depressurization time is supported.	N/A	Started (Being tracked as NRC Confirmatory Item 3.2.1.B)

NRC Interim Staff Evaluation Open Item	Status
<p>3.2.1.8.A- Core Sub-Criticality - Confirm that Turkey Point will apply the generic resolution for boron mixing under natural circulation conditions potentially involving two-phase flow, in accordance with the PWROG position paper, dated August 15, 2013, and subject to the conditions provided in the NRC endorsement letter dated January 8, 2014. Alternatively, justify the boric acid mixing assumptions that will ensure adequate shutdown margin exists through all 3 phases of an ELAP event.</p>	<p>Closed per the status provided in the 2nd six-month update (Reference 8). The status provided confirms Turkey Point will apply PWROG position paper on boron mixing, including the NRC additional considerations. Therefore the alternative approach of justifying the boric acid mixing assumptions is no longer applicable.</p>
<p>3.2.1.9. A- The Turkey Point RCS inventory coping strategy involves an approach that relies on repowering one of three installed charging pumps in each unit from multiple power connection points using one of the two 100% capacity, portable 480 VAC FLEX diesel generators. Verify that these installed pumps will be capable of performing their mitigating strategies function following an undefined ELAP event, in contrast to using a portable FLEX pump.</p>	<p>Based on NRC comments received regarding Attachment 6 of the 2nd six-month update, Turkey Point has documented compliance in a white paper titled "Turkey Point FLEX Open Item Paper" that is available through the NRC streamlined process of the audit review.</p>
<p>3.2.4.7.A- The licensee relies on separation and redundancy of the RWSTs to show that at least one will survive a high wind event with wind-driven missiles. Verify that the RWSTs are sufficiently robust and that sufficient separation exists between the tanks to support the determination that at least one tank will be available as a water source following a high wind event, as credited in the Turkey Point mitigating strategies.</p>	<p>Based on NRC comments received regarding Attachment 7 of the 2nd six-month update, Turkey Point has documented compliance in a white paper titled "Turkey Point FLEX Open Item Paper" that is available through the NRC streamlined process of the audit review.</p>

7 Potential Draft Safety Evaluation Impacts

See FPL response to open items in Section 8.

8 Interim Staff Evaluation Confirmatory Items

Confirmatory Item 3.1.1.3.A:

Confirm that the large internal flooding sources that are not seismically robust will not impact the implementation of the mitigating strategies during an ELAP event.

Response:

In Progress – The components required to implement the mitigating strategies during an ELAP event have been identified. The component locations and the travel paths associated with the mitigating strategies have also been identified. A detailed analysis is being performed to determine if the components or travel paths will be adversely affected by an internal flooding event. The results of this analysis will be included in the FLEX basis documents scheduled for completion March 2015.

Confirmatory Item 3.1.1.4.A:

Off-Site Resources -Confirm the location of the local staging area for the RRC equipment, and that access routes to the site, the method of transportation, and the drop off area have been properly evaluated for all applicable hazards.

Response:

In Progress- All of this information is being developed as part of the RRC playbook. This item is scheduled for completion January 2015.

Confirmatory Item 3.2.1.A:

Confirm recalculation of the boration requirements for the Phase 2 RCS cooldown to provide additional margin and flexibility for the boration activity.

Response:

In Progress- A new calculation has been prepared that addresses the boration requirements for Phase 2 RCS cooldown. This calculation will be approved and issued as part of the FLEX basis documents scheduled for completion March 2015.

Confirmatory Item 3.2.1.B:

Confirm the analysis used to validate the RCS cooldown and depressurization timeline once the RCP low-leakage seal design is completed.

Response:

In Progress- An analysis is being prepared that is based on the applicable RCP low-leakage seal design. The analysis is scheduled for completion November 2014.

Confirmatory Item 3.2.1.1.A:

Reliance on the NOTRUMP code for the ELAP analysis of Westinghouse plants is limited to the flow conditions before reflux condensation initiates. This includes specifying an acceptable definition for reflux condensation cooling. Confirm that Turkey Point has properly applied these conditions for the ELAP analysis.

Response:

In Progress- RETRAN has been selected as the code and methodology for performing the RCS cooldown analysis during reflux conditions. The RETRAN methodology is already under NRC review for applicability at the South Texas Project (STP). The Turkey Point analysis will be consistent with the NRC's acceptance of the RETRAN methodology for the RCS cooldown analysis.

Confirmatory Item 3.2.1.1.B:

Confirm recalculation of the SG pressure setpoint to prevent injection of nitrogen from the accumulators using the guidance in the PWROG position paper.

Response:

The response provided in the second 6 month update is unchanged. This completion date has been changed to November 2014.

Confirmatory Item 3.2.1.2.A:

Confirm that the RCP seal leakage rate of one gpm/seal for the FlowServe safe shutdown/low leakage seals used in the ELAP analysis is adequately justified, including the computer code/methodology and assumptions used, and the supporting test data applied, when the site specific evaluation is performed.

Response:

In Progress-FLOWSERVE submitted a white paper on this item to the NRC. Additional comments provided by the NRC are currently under review by FLOWSERVE. An update that specifically addresses the application of these seals to Turkey Point will be provided in the next six-month update.

Confirmatory Item 3.2.1.5.A:

Confirm that the instrumentation used to measure the listed parameters and the associated setpoints, credited in the ELAP analysis for automatic actuations and indications required for the operator to

take appropriate actions, is reliable and accurate in the containment harsh conditions resulting from an ELAP event.

Response:

The response provided in the second 6 month update (Reference 8) is unchanged, except that the list of instruments (in the response to the confirmatory item) that did not meet the environmental qualification requirements inadvertently did not include the containment pressure transmitters. These instruments were listed in Attachment 5 of the Enclosure to Reference 8 as not meeting full EQ requirements. The results of the evaluation will be reported in the next 6 month update.

Confirmatory Item 3.2.1.6.A:

Confirm that the revised Modular Accident Analysis Program containment analysis supports the revised strategy for maintaining containment (reliance on containment venting instead of containment spray), and also confirm that the Sequence of Events timeline is properly revised and any impacts of the changes are appropriately addressed.

Response:

The response provided in the second 6 month update is unchanged. . Once the analysis is completed, the time line will be updated and reported in the next 6 month update.

Confirmatory Item 3.2.1.9.B:

Confirm completion of the licensee's final engineering designs and supporting analyses for portable equipment that directly performs a FLEX mitigation strategy.

Response:

The response provided in the second 6 month update is unchanged. This completion date has been changed to November 2014.

Confirmatory Item 3.2.4.1.A:

Confirm that the charging pumps have adequate cooling following an ELAP event (i.e., through intermittent operation, or by providing cooling to the fluid drive heat exchanger).

Response:

The response provided in the second 6 month update is unchanged. This completion date has been changed to November 2014.

Confirmatory Item 3.2.4.4.A:

The NRC staff has reviewed the licensee communications assessment (ADAMS Accession Nos. ML 12300A425 and ML 13064A359) and has determined that the assessment is reasonable (ADAMS Accession No. ML13149A382). Confirm that upgrades to the site's communications systems have been completed.

Response:

The response provided in the second 6 month update is unchanged. This completion date for full implementation has been changed to June 2015.

Confirmatory Item 3.2.4.9.A:

Confirm completion of the refueling plan for portable FLEX equipment and sizing of the refueling trailer.

Response:

The refueling plan has been completed and will be approved/issued as part of the FLEX basis documents scheduled for completion March 2015. The plan's strategy calls for the use of an onsite diesel fuel oil refueling trailer to transfer fuel from the Unit 4 Diesel Oil Storage Tank to those components that require diesel fuel oil to operate.

Confirmatory Item 3.4.A:

Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10 regarding offsite resources have been adequately addressed.

Response:

The response provided in the second 6 month update is unchanged.

9 References

1. NRC Order Number EA-12-049, "Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012, ADAMS Accession No. ML12056A045
2. FPL Letter, L-2013-061, Florida Power and Light Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 26, 2013, ADAMS Accession No. ML13072A038
3. FPL Letter, L-2013-249, Florida Power and Light Company's, Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) , dated August 21, 2013, ADAMS Accession No. ML13248A311
4. Westinghouse Letter, LTR-FSE-13-46, Rev. 0, Westinghouse Response to NRC Generic Request for Additional Information (RAI) on Boron Mixing in Support of the Pressurized Water Reactor Owners Group (PWROG), Dated August 15, 2013, Proprietary ADAMS Accession No ML13235A135
5. NRC Letter from Jack Davis, Director, Mitigating Strategies Directorate Office of Nuclear Reactor Regulation to Mr. Jack Stringfellow, Pressurized Water Reactors Owners Group, dated January 8, 2014, ADAMS Accession No. ML13276A183
6. NRC Letter, Turkey Point, Units 3 And 4 -Interim Staff Evaluation Relating To Overall Integrated Plan In Response To Order Ea-12-049 (Mitigation Strategies) (TAC NOS. MF0982 AND MF0983), dated February 6, 2014, ADAMS Accession No. ML14002A160
7. FPL Letter, L-2013-087, Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flood Hazard Reevaluation of Recommendation 2.1, dated March 11, 2013, ADAMS Accession No. ML13095A196
8. FPL Letter, L-2014-041, Florida Power and Light Company's, Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2014, ADAMS Accession No. ML14073A454

10 Attachments

NONE