



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

January 20, 2015

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy
P.O. Box 14000
Juno Beach, FL 33408-0420

SUBJECT: ST. LUCIE PLANT, UNIT NO. 2 - ISSUANCE OF AMENDMENT REGARDING
SURVEILLANCE REQUIREMENTS FOR SNUBBERS TO CONFORM TO
REVISIONS TO THE SNUBBER TESTING PROGRAM (TAC NO. MF3470)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment No. 169 to Renewed Facility Operating License No. NPF-16 for the St. Lucie Plant, Unit No. 2. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated January 30, 2014, as supplemented by letters dated July 21 and October 23, 2014.

This amendment modifies the St. Lucie Plant, Unit No. 2 TS 3/4.7.9, "Snubbers." This change will revise the TS surveillance requirements for snubbers to conform to the revised St. Lucie Snubber Testing Program.

The NRC staff's related safety evaluation of the amendment is enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba".

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-389

Enclosures:

1. Amendment No. 169 to NPF-16
2. Safety Evaluation

cc w/enclosures: Distribution via Listserv



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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-389

ST. LUCIE PLANT, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 169
Renewed License No. NPF-16

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (FPL, the licensee), dated January 30, 2014, as supplemented by letters dated July 21 and October 23, 2014, 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.

Enclosure 1

2. Accordingly, Renewed Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 3.B to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 169 , are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Shana R. Helton, Chief
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and Technical
Specifications

Date of Issuance: January 20, 2015

ATTACHMENT TO LICENSE AMENDMENT NO. 169
TO RENEWED FACILITY OPERATING LICENSE NO. NPF-16
DOCKET NO. 50-389

Replace Page 3 of Renewed Operating License NPF-16 with the attached Page 3.

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

3/4 7-21
3/4 7-22
3/4 7-22a
3/4 7-22b
3/4 7-23
3/4 7-24
3/4 7-25
6-15j

INSERT

3/4 7-21
3/4 7-22
3/4 7-22a
3/4 7-22b
3/4 7-23
3/4 7-24
3/4 7-25
6-15j

neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required.

- D. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FPL to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - E. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FPL to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission's regulations: 10 CFR Part 20, Section 30.34 of 10 FR Part 30, Section 40.41 of 10 CFR Part 40, Section 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; 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 below:
- A. Maximum Power Level

FPL is authorized to operate the facility at steady state reactor core power levels not in excess of 3020 megawatts (thermal).
 - B. Technical Specifications

The Technical Specifications contained in Appendices A and 8, as revised through Amendment No. 169 are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

PLANT SYSTEMS

3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All safety-related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9. on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program.

a. **Exemption From Visual Inspection or Functional Tests**

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date.

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ADMINISTRATIVE CONTROLS (continued)

n. Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- (i) Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 1. An API gravity or an absolute specific gravity within limits,
 - 2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 - 3. A clear and bright appearance with proper color or a water and sediment content within limits;
- (ii) Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- (iii) Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

o. Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendation of Regulatory position c.4.b of Regulatory Guide 1.14 , Revision 1, August 1975.

p. Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

- 1. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- 2. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval.
- 3. The program shall, as required by 10 CFR 50.55a(b)(3)(v)(B), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".
- 4. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)(B)) subject to the limitations and modifications listed therein.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 169

TO RENEWED FACILITY OPERATING LICENSE NO. NPF-16

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NO. 2

DOCKET NO. 50-389

1.0 INTRODUCTION

By letter dated January 30, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14049A284), Florida Power and Light Company (the licensee), submitted a request for changes to the St. Lucie Plant, Unit No. 2 (SL-2) Technical Specifications (TSs). In response to request for additional information, the licensee supplemented the original licensee amendment request (LAR) on July 21, 2014 (ADAMS Accession No. ML14212A395), and October 23, 2014 (ADAMS Accession No. ML14300A012). The proposed amendment would revise TS 3/4.7.9, "Snubbers," specifically TS Surveillance Requirement (SR) 4.7.9 to reference the newly added TSs Administrative Controls, Section 6.8.4.p, "Snubbers Testing Program." This addition includes the planned revisions to the SL-2 snubber inservice inspection (ISI) testing and service life monitoring programs, and removes the specific snubber inservice examination and testing requirements from TSs.

The supplements dated July 21 and October 23, 2014, 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 September 30, 2014 (79 FR 58818).

2.0 REGULATORY EVALUATION

A dynamic restraint (snubber) is a device designed to protect components from excess shock or sway caused by seismic disturbances or other transient forces. During normal operating conditions, the snubber allows for movement in tension and compression. When an impulse event occurs, the snubber becomes activated and acts as a restraint device. The device becomes rigid, absorbs the dynamic energy, and transfers it to the supporting structure.

The proposed change, in essence, relocates the specific snubber inservice examination and testing requirements located in TS 3/4.7.9 and replaces them with a new TS SR 4.7.9 that states, "Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program." The Snubber Testing Program is included in the newly added TSs Administrative Controls, Section 6.8.4.p.

The revised Snubber Testing Program includes revisions to the SL-2 snubber ISI, testing, and service life monitoring programs. The purpose of the Snubber Testing Program as provided in the July 21, 2014, LAR, Attachment 3, "Snubber Testing Program Plan," is to provide requirements for the performance and administration of assessing the operational readiness of those dynamic restraints whose specific functions are required to ensure the integrity of the reactor coolant pressure boundary.

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical Specifications," provides the regulatory requirements for the contents in a licensee's TSs. This regulation requires that the TSs include items in the five specific categories related to station operation. These categories include (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) SRs; (4) design features; and (5) administrative controls. The regulation does not specify the particular requirements to be included in a plant's TSs. In Item 3, 10 CFR 50.36(c)(3) notes that SRs are requirements relating to test, calibration, or inspection to assure that necessary quality of systems and components is maintained.

In general, there are two classes of changes to TSs: (1) changes needed to reflect modifications to the design bases, and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required contents and preferred format of TSs over time. This amendment deals with the second class of changes. In determining the acceptability of revising TS 3/4.7.9, the NRC staff used the accumulation of generically approved guidance in NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants, Revision 4.0," dated April 2012.

Requirements for ISI of Class 1, Class 2, Class 3, Class MC, and Class CC components (including supports) are located in 10 CFR 50.55a(g). The regulation in 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TSs for that facility, the licensee shall apply to the Commission for amendment of the TSs to conform the TSs to the revised program. The licensee shall submit this application at least 6 months before the start of the period during which the provisions become applicable.

Further, 10 CFR 50.55a(b)(3)(v) allows licensees the option of using the inservice examination and testing provisions for snubbers in American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, or the ASME Operations and Maintenance of Nuclear Power Plants (OM) Code. However, the ASME Code, Section XI option no longer exists when using the 2006 Addenda and later editions and addenda of ASME Code, Section XI, because these editions and addenda of Section XI do not provide ISI provisions for snubbers. When using the 2006 Addenda or later editions of ASME Code, Section XI, snubber examination and testing must be in accordance with the ASME OM Code, Subsections ISTA and ISTD.

The SL-2 third 10-year ISI interval was scheduled to end on August 7, 2013. ASME Code, Section XI, IWA-2430(d)(1) states in part that, "Each interval may be extended by as much as 1 year..." Therefore, the licensee has extended the third 10-year interval to August 7, 2014. The fourth 10-year ISI interval at SL-2 began on August 8, 2014, and was scheduled to end August 7, 2024. Currently, snubber examination and testing are performed in accordance with the specific requirements of TS 3/4.7.9 and the SL-2 procedures. For the rest of the fourth 10-year ISI interval at SL-2, the snubber program will meet the requirements of ASME OM Code, Subsection ISTD, Edition 2004 with 2005 and 2006 Addenda per 10 CFR 50.55a(b)(3)(v).

3.0 TECHNICAL EVALUATION

3.1 Proposed Changes

The proposed changes to the SL-2 TSs are summarized below:

- Reference to TS 4.7.9f in TS ACTION 3.7.9 will be replaced with reference to TS 4.7.9.
- TS SR 4.7.9 will be revised to replace specific SRs for demonstrating snubber operability with reference to the newly added TSs Administrative Controls, Section 6.8.4.p "Snubber Testing Program," as follows:

TS SR 4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program.

(Note: All other details about snubber visual inspection, functional testing, and service life program requirements as described in TS SR 4.7.9 a, b, c, d, e, f, g, h, and i that are proposed to be deleted are not being repeated here.)

- Section 6.8.4.p, "Snubber Testing Program," will be added to the TSs Administrative Controls, Section 6.8.4, "Procedures and Programs," to provide a description of the Snubber Testing Program as follows:

6.8.4.p Snubber Testing Program

This program conforms to the examination, testing, and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a ISI requirements for supports. The program shall be in accordance with the following:

- a. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- b. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the ASME Code and the ASME OM Code that are incorporated by reference in 10 CFR 50.55a(b), subject to its limitations and modifications, and subject to Commission approval.
- c. The program shall, as allowed by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements," and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor

Nuclear Power Plants,” in lieu of the ASME Code, Section XI, ISI requirements for snubbers, or meet authorized alternatives pursuant to 10 CFR 50.55a(a)(3).

- d. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a (including 10 CFR 50.55a(b)(3)(v)) subject to the limitations and modifications listed therein.

At SL-2, during the third 10-year ISI interval, snubber visual inspection and functional testing performed in accordance with the specific requirements of TS 3/4.7.9 and snubber program document QI-10-PR/PSL-6 met the requirements of ASME OM Code, as permitted by 10 CFR 50.55a(b)(3)(v).

For the fourth 10-year ISI interval, as permitted by 10 CFR 50.55a(b)(3)(v), SL-2 intends to adopt Subsection ISTD of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda. The ASME Code, Section XI option no longer exists when using the 2006 Addenda and later editions and addenda of ASME Code, Section XI, because these editions and addenda of Section XI do not provide ISI provisions for snubbers. As such, the proposed changes to TS 3/4.7.9 are required to conform the TSs to this revised snubber program.

3.2 NRC Staff Evaluation of Proposed Changes

The licensee has developed a detailed Snubber Testing Program as a licensee-controlled document at SL-2, which will be implemented in lieu of the deleted TS snubber examination, testing, and service life program requirements. This Snubber Testing Program will contain snubber examination, testing, and a service life monitoring program, and will be based on the requirements referenced in the TS Administrative Controls, Section 6.8.4.p.

The NRC staff has completed its review of the submitted LAR related to the snubber examination and testing program described in TS 3/4.7.9 and concludes that the proposed amendment to revise the Snubber TS 3/4.7.9 is acceptable. The staff finds that the program requirements are consistent with the ISI and testing requirements for snubbers as required by 10 CFR 50.55a. The staff also notes that the snubber ISI and testing program at SL-2 will be performed per the requirements of the ASME OM Code 2004 Edition with 2005 and 2006 Addenda), Subsection ISTD, as allowed by 10 CFR 50.55a(b)(3)(v)(B).

Based on the above determination that the Snubber Testing Program is consistent with 10 CFR 50.55a, the NRC staff further finds that the examination, testing, and service life monitoring for snubbers in accordance with the Snubber Testing Program, as required by SR 4.7.9, is sufficient to demonstrate that snubbers are OPERABLE in accordance with LCO 3.7.9. Therefore, the NRC staff concludes that the proposed changes to SR 4.7.10 are consistent with the requirements in 10 CFR 50.36(c)(3) and, therefore, are acceptable.

The NRC staff finds the proposed change to LCO 3.7.9 to revise its existing reference to “Specification SR 4.7.9” is appropriate. Based on the above considerations, the NRC staff concludes that the proposed amendments are acceptable.

3.3 Technical Evaluation Conclusion

As set forth above, the NRC staff concluded that the proposed amendment to revise the Snubber TS 3/4.7.9 is acceptable. Specifically, the change replaces the TS SR 4.7.9 requirements for snubber examination, testing, and service life monitoring with reference to the ISI program requirements for snubbers contained in TS Administrative Controls, Section 6.8.4.p and revises the TS Administrative Controls sections to add a "Snubber Testing Program."

As specified in this submittal, the licensee shall update the snubber ISI and testing program at SL-2 for the fourth 10-year ISI interval that began on August 8, 2014, to meet the requirements of the ASME OM Code, Edition 2004 with 2005 and 2006 Addenda, Subsection ISTD. All the applicable documents at SL-2 should be revised to the new ASME OM Code ISTD requirements along with ASME OM Code Subsection ISTA, "General Requirements."

4.0 STATE CONSULTATION

Based upon a letter dated May 2, 2003, from Michael N. Stephens of the Florida Department of Health, Bureau of Radiation Control, to Ms. Brenda L. Mozafari, Senior Project Manager, NRC, the State of Florida does not desire notification of issuance of license amendments. In an e-mail dated July 25, 2012 (ADAMS Accession No. ML12208A014), from Cynthia Becker, Florida State Bureau of Radiation Control, to Farideh E. Saba, Senior Project Manager, NRC, the State of Florida confirmed that the May 2003 letter continues to reflect the State's position on notification of issuance of license amendments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change SRs. 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 (79 FR 58818, dated September 30, 2014). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

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) there is reasonable assurance that such activities will be

conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Bedi Gurjendra

Date: January 20, 2015

January 20, 2015

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy
P.O. Box 14000
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SUBJECT: ST. LUCIE PLANT, UNIT NO. 2 - ISSUANCE OF AMENDMENT REGARDING SURVEILLANCE REQUIREMENTS FOR SNUBBERS TO CONFORM TO REVISIONS TO THE SNUBBER TESTING PROGRAM (TAC NO. MF3470)

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Sincerely,

/RA/

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-389

Enclosures:

- 1. Amendment No. 169 to NPF-16
- 2. Safety Evaluation

cc w/enclosures: Distribution via Listserv

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ADAMS Accession No.: ML14342A785

*** By Memorandum**

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DATE	1/14/15	1/15/15	1/14/15	1/15/15	11/21/14
OFFICE	DSS/STSB	OGC	LPL2-2/BC	LPL2-2/PM	
NAME	RElliott	STurk	SHelton	FSaba	
DATE	12/23/14	12/24/14	1/20/15	1/20/15	

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