



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

June 17, 2016

Mr. Dan Tallman, Manager
Rancho Seco Assets
Sacramento Municipal Utility District
14440 Twin Cities Road, MS N493
Herald, CA 95638

**SUBJECT: RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION
INSPECTION REPORT 05000312/2016001 AND 07200011/2016001**

Dear Mr. Tallman:

An inspection was completed by the U.S. Nuclear Regulatory Commission (NRC) of your dry cask storage activities associated with your Independent Spent Fuel Storage Installation on May 17-18, 2016. An exit was conducted with your staff to discuss the findings of the inspection on May 18, 2016. The inspection was conducted to confirm compliance with the requirements specified in your site specific Materials License No. SNM-2514 and associated Technical Specifications, the Rancho Seco Independent Spent Fuel Storage Installation Final Safety Analysis Report and the regulations in 10 *Code of Federal Regulations* Part 20 and Part 72.

The inspection reviewed the areas of radiation safety, quality assurance, corrective action program, and safety evaluations. The inspection reviewed changes made to your Independent Spent Fuel Storage Installation program since the last NRC Independent Spent Fuel Storage Installation inspection. Your Independent Spent Fuel Storage Installation operations were determined to be in compliance with the applicable NRC regulations and requirements and your storage casks were found to be in good physical condition. No violations of NRC regulations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal, privacy or proprietary information so that it can be made available to the public without redaction.

D. Tallman

- 2 -

Should you have any questions concerning this inspection, please contact Mr. Eric J. Simpson at 817-200-1553 or myself at 817-200-1197.

Sincerely,

/RA/

Jack E. Whitten, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Dockets: 50-312, 72-11
Licenses: DPR-54, SNM-2510

Enclosure:
Inspection Report 05000312/2016001;
07200011/2016001

Attachment:
Supplemental Information

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Dockets: 050-00312, 072-00011

Licenses: DPR-54, SNM-2510

Report Nos.: 05000312/2016001 and 07200011/2016001

Licensee: Sacramento Municipal Utility District

Facility: Rancho Seco Nuclear Generating Station and
Independent Spent Fuel Storage Installation

Location: 14440 Twin Cities Road
Herald, CA 95638-9799

Dates: May 17-18, 2016

Inspector: Eric J. Simpson, Health Physicist
Fuel Cycle and Decommissioning Branch

Approved By: Jack Whitten, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Sacramento Municipal Utility District Rancho Seco Facility and Independent Spent Fuel Storage Installation NRC Inspection Report 05000312/2016001 and 07200011/2016001

The U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection of the Sacramento Municipal Utility District's programs and activities for safe handling and storage of spent fuel at the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) on May 17-18, 2016. The inspection reviewed a number of topics to evaluate compliance with the applicable NRC regulations and the provisions of their site specific license SMN-2510. Rancho Seco facility currently maintains both a Title 10 *Code of Federal Regulations* (10 CFR) Part 50 license (Docket 050-00312), and a 10 CFR Part 72 license (Docket 72-00011). Class B and C low-level radioactive wastes stored on-site in the Interim Onsite Storage Building (IOSB) during the last ISFSI inspection have been removed and transported to an offsite disposal facility (ML14233A239). Greater-than-Class C (GTCC) wastes are currently stored in the ISFSI under the 10 CFR Part 72 license. The majority of the 10 CFR Part 50 site has been remediated, decommissioned, and released from the 10 CFR Part 50 license. The IOSB is the only remaining area requiring scoping and characterization surveys in preparation for remediation and final status survey. Current decommissioning activities at the site consist of those activities related to the release the IOSB from the 10 CFR Part 50 license and maintaining the GTCC radioactive waste and spent fuel in dry storage until options are available to ship the radioactive waste offsite for permanent disposal. Twenty-two casks have been loaded and stored in Horizontal Storage Modules on the Rancho Seco ISFSI pad. All spent nuclear fuel was moved to the ISFSI pad between April 2001 and August 2002. The GTCC waste canister was loaded and placed on the ISFSI pad in August 2004. The ISFSI and other areas of the decommissioning reactor site were well maintained and dose rates around the ISFSI perimeter were being monitored as required. A review of the radiological environmental monitoring program demonstrated that radiological exposures to offsite locations and individuals onsite were in compliance with federal regulations.

The NRC routine inspection reviewed documentation relevant to the 10 CFR Part 72 ISFSI activities and operations that have occurred at Rancho Seco since the last NRC ISFSI inspection performed in June 2013. The documentation reviewed by the inspector included quality assurance audits and other reports, radiological surveys, and corrective action reports. In addition, the inspector reviewed documents that demonstrated compliance to the licensee's technical specifications, compliance with the ISFSI Final Safety Analysis Report (FSAR), and the licensee's response to requisite NRC information notices and Regulatory Information Summaries.

Away-From-Reactor ISFSI Inspection Guidance (60858)

- The licensee was conducting quality assurance audits of all site programs, including those impacting the ISFSI program. A review of 29 audit reports determined that the Quality Assurance Program was covering a broad range of areas. Issues identified during the audits were entered into the Rancho Seco corrective action program for resolution. Selected condition reports in the corrective action program were reviewed for the period June 2013 through May 2016. A wide range of conditions had been identified and resolved. Resolutions by the licensee of the selected condition reports were appropriate for the safety

significance of the identified issues. No adverse trends were identified during the review. (Section 1.2.a)

- Radiation levels around the ISFSI pad were consistent with site quarterly surveys and area monitoring results. Radiation data reviewed from the calendar year 2013, 2014, and 2015 Annual Radiological Environmental Operating Reports indicated that radiation levels offsite were in compliance with 10 CFR 72.104. (Section 1.2.b)
- Since the last NRC ISFSI inspection (June 2013), Rancho Seco had not revised its ISFSI license or FSAR. The latest revision, Rev. 4, was submitted to NRC on June 30, 2010. (Section 1.2.c)
- The ISFSI License SNM-2510, Technical Specification 5.5.3 requirements for daily horizontal storage module roof temperature monitoring/vent inspections were performed as required. No temperature issues with the casks were identified during the review of selected records. (Section 1.2.d)
- There were no changes to the licensee's emergency planning program since the last NRC inspection in June 2013. The inspector verified that the required annual drills and biennial exercises with the specific focus areas had been occurring onsite periodically since the last ISFSI inspection from June 2013 through May 2016. These drills and exercises were reviewed by the inspector and determined to be compliance with the emergency plan and 10 CFR 72.32 (a)(12) requirements. (Section 1.2.e)

Review of 10 CFR 72.48 Evaluations (60857)

- All required safety screenings and safety evaluations had been performed in accordance with the site's procedures and requirements of 10 CFR 72.48. All screenings and safety evaluations reviewed were determined to have been adequately evaluated. (Section 2)

Report Details

Summary of Facility Status

The Sacramento Municipal Utility District (SMUD) maintains a site-specific 10 CFR Part 72 license (SNM-2510) for its ISFSI at the Rancho Seco site with 22 loaded casks. Twenty-one storage canisters contain 493 spent fuel assemblies on the ISFSI pad, including 13 failed fuel assemblies loaded into a dedicated failed fuel canister and 6 suspected failed fuel assemblies loaded into 5 undamaged fuel canisters. The final storage canister contains reactor related GTCC waste and is stored on the pad along with the spent fuel assemblies. The spent fuel assemblies and the GTCC waste canisters are stored in AREVA TN NUHOMS Horizontal Storage Module (HSM) design casks. The Rancho Seco dry shielded canisters (DSCs) are based on the Standardized NUHOMS 24P - DSC design. The 21 canisters containing fuel assemblies were loaded using procedures specified in SNM-2510 License Amendment 0 and FSAR Revision 1 or 2. The GTCC canister was loaded using SNM-2510 License Amendment 2 and FSAR Revision 3. License Amendment 3 of SNM-2510 was issued on August 11, 2009, to allow for the continued storage of 6 suspected failed fuel assemblies in 5 DSCs already in storage on the pad. The discovery of the potentially failed fuel was made after the fuel had been loaded into the ISFSI. At the time of the inspection, the licensee was currently on SNM-2510 License Amendment 3 and the FSAR Revision 4.

1. Away-From-Reactor ISFSI Inspection Guidance (60858)

.1 Inspection Scope

An inspection of the status and condition of the loaded casks at Rancho Seco was completed to verify compliance with requirements of its SNM-2514 License, ISFSI FSAR, and federal regulations. The inspection reviewed a broad range of topics including Quality Assurance audits and surveillances conducted by the licensee, condition reports related to the ISFSI, environmental radiological data collected around the ISFSI for the past several years, review of the cask maintenance records, and emergency preparedness activities for the site. An inspection of the ISFSI pad area was performed and radiological dose rate measurements were conducted by the inspector around the perimeter of the ISFSI pad and near the casks.

.2 Observations and Findings

a. Quality Assurance Audits, Surveillances, and Corrective Actions Program

Audit and Quality Services (AQS) from SMUD had been performing 10 CFR Part 50 and 10 CFR Part 72 Quality Assurance audits and surveillances as required by Procedure RSLBD-010, "Rancho Seco Quality Manual," Rev. 2. Twenty-nine AQS audit reports had been issued since the last ISFSI inspection that occurred in June 2013. Many of these audits assessed the performance of quality related programs and activities that impacted ISFSI operations, including the Emergency Preparedness Program; License and Technical Specification Compliance; Radiation Protection and as low as reasonably achievable (ALARA); Materials Control and Accounting; Design Control and Test Control. All of the Quality Assurance audit reports were reviewed as

part of the current inspection. The audit reports made numerous recommendations and a number of issues were placed into the Rancho Seco corrective action program (CAP) as a result. It should be noted that the majority of the ISFSI related issues and recommendations were related to procedure consolidation and procedure cancellation due to reduced site operations.

When a problem or condition was identified at Rancho Seco, the licensee would document the issue as a potential deviation from quality (PDQ) for placement into its CAP, as required by Procedures RSAP-1308, "Potential Deviation from Quality," Rev. 18 and RSAP-1310, "Deviation from Quality," Rev. 9. The licensee provided the inspector with a list of ISFSI related PDQs issued since the last NRC inspection. Out of the list of PDQs (including those initiated as a result of the QA audits or surveillances), the inspector selected seven for further review. All of the ISFSI related PDQs were of minimal safety significance. The selected PDQs were well documented and properly categorized based on the significance of the identified conditions. Follow-up corrective actions were appropriately assigned. The types of conditions described in the PDQs reflected a mature ISFSI program, the issues reviewed were not related to the ISFSI casks or other components designated as important to safety. No NRC safety concerns were identified during the review of the QA audits, surveillances, or condition reports.

b. Radiological Conditions Related to Stored Casks

The NRC inspector verified the radiological conditions of the Rancho Seco ISFSI through a review of direct radiation monitoring data, the most recent radiological surveys conducted by the licensee, and a tour of the ISFSI pad with a radiation survey meter. The NRC inspector was accompanied by the Manager of Rancho Seco, a member of the security staff, and others during the inspection of the ISFSI pad. The ISFSI pad was securely fenced and locked inside its protected area (PA). The ISFSI pad was surrounded on all sides by an approach apron consisting of many feet of concrete pavement, which was surrounded by many feet of gravel and security fences. The ISFSI area was absent of any vegetative growth and there were no flammable, combustible, or unexpected items present on or near to the ISFSI storage pad. The ISFSI pad contained 22 AREVA TN NUHOMS HSM casks. Twenty-one HSMs contained spent nuclear fuel assemblies and one contained reactor related GTCC waste from the Rancho Seco reactor. The ISFSI pad and storage casks were in good physical condition. The NRC inspector carried a Ludlum Model 19 sodium-iodide gamma survey meter (NRC #033906, calibration due March 8, 2017) which measured gamma exposure rates in microRoentgens per hour ($\mu\text{R}^1/\text{h}$). The inspector recorded radiation levels at the ISFSI fence boundary locations that ranged from 50 - 65 $\mu\text{R}/\text{h}$. Based on the survey results, the ISFSI radiation controlled area boundary measured from 360 – 600 $\mu\text{R}/\text{h}$. The background exposure rate was determined to be ~ 8 $\mu\text{R}/\text{h}$ at an offsite location. The radiological conditions in and around the ISFSI were consistent with recent survey

¹ For the purposes of making comparisons between NRC regulations based on dose-equivalent (rem) and measurements made in Roentgens, it may be assumed that one Roentgen equals one rem. (<http://www.nrc.gov/about-nrc/radiation/protects-you/hppos/qa96.html>)

reports and the last routine NRC inspection performed onsite (ML13235A252). The ambient radiation levels were as expected, given the heat load of the spent fuel, time spent in storage, and the storage configuration of the spent fuel in the Rancho Seco ISFSI. Areas of the ISFSI were properly posted as both a radiation area and a radioactive materials area.

ISFSI direct radiation monitoring data was reviewed by the inspector. Rancho Seco monitored direct radiation impacts onsite and offsite by using optically stimulated luminescent (OSL) dosimeters. Monitoring data was reviewed by the inspector for the previous two years and the first quarter of 2016. The OSL dosimeter monitoring results documented the expected overall declining ambient radiation levels near the ISFSI boundary (see Table 1, below).

Table 1, Yearly ISFSI Direct OSL Monitoring Results (mrem)²

Sample ID	Location	2010	2011	2012	2013	2014	2015
ISFSI-1	North Fence	301	293	301	N/A	256	241
ISFSI-2	North Fence	419	404	429	N/A	353	312
ISFSI-3	West Fence	100	92	112	N/A	107	93
ISFSI-4	West Fence	102	101	106	N/A	115	93
ISFSI-5	South Fence	274	259	275	N/A	220	200
ISFSI-6	South Fence	433	406	413	N/A	350	337
ISFSI-7	East Fence	92	80	89	N/A	83	79
ISFSI-8	East Fence	101	73	92	N/A	83	72

The NRC inspector also reviewed direct radiation monitoring data from the Rancho Seco Annual Radiological Environmental Operating Reports (AREORs) for 2013 (ML14126A730), 2014 (ML15099A583), and 2015 (ML16083A180). The AREORs are published annually to document the radiological impacts to onsite and offsite locations as a result of licensed activities onsite. The AREORs were compiled and published by the Radiological Environmental Monitoring Program (REMP). Among many other environmental monitoring locations, these reports documented indicator OSL dosimetry results for locations near site boundary locations in close proximity to the ISFSI. These results were selected to document direct radiation dose equivalent rates to any individual located at the site controlled area boundary near the ISFSI (see Table 2, below).

Table 2, REMP Monitoring Locations near ISFSI (in mrem)³

Sample ID	Location	2013	2014	2015
88	South ISFSI 100 m fence	12.5	10	14.5
89	Southwest Corner ISFSI 100 m fence	9.5	9	11.5
90	Northwest Corner ISFSI 100 m fence	18.5	18	20.5
94	North ISFSI 100 m fence	19.5	18	20.5
99	ISFSI 100 m fence vehicle access gate	14.5	9	16.5

² Monitoring data was normalized to represent doses over an 8760 hour year. Data for 2013 was not reviewed.

³ All values corrected for background.

The REMP data documented the dose equivalent to any individual located at the site controlled area boundary and was determined to be well below the 10 CFR 72.104(a)(2) requirement of less than 25 millirem per year above background. Direct radiation impacts from the Rancho Seco ISFSI met all regulatory requirements.

c. Changes to the SNM-2510 License and FSAR

At the time of the inspection, Rancho Seco was utilizing ISFSI License SNM-2510 Amendment 3 and FSAR Revision 4. No changes or updates had been made to the license or FSAR since the last time NRC performed an ISFSI inspection onsite in June 2013.

d. Daily Vent Inspections and Thermal Monitoring per Technical Specification 5.5.3

The ISFSI License SNM-2510, Technical Specification Section 5.5.3 requires daily visual inspections of the air inlet vents for the HSMs and required daily temperature monitoring of the HSM's roof temperatures. For temperature monitoring, if any temperature monitor was determined to rise more than 80 degrees Fahrenheit (°F) in a 24 hour period or if any temperature reading exceeded 225°F, a change of temperature of this magnitude indicated that it was possible that an inlet or outlet vent had become blocked and would require corrective action. To perform these actions the licensee utilized Procedure RSIP-710, "ISFSI & Instrument Checks & System Verification Daily Surveillance," Revision 0 for reviewing and recording the concrete temperatures. Additionally, the procedure required the licensee to visually inspect the inlet vents on a daily basis. The inspector reviewed a representative samples of the documentation for both types of required surveillances. This sample reviewed by the inspector addressed the months of June 2014, October 2015, and January 2016. The licensee's records demonstrated that the technical specification requirements had been routinely performed and correctly documented as required by procedure and the License Technical Specification. The NRC inspector did not identify any adverse conditions in the surveillance records.

e. Emergency Plan

Changes to the licensee's emergency planning program since the last NRC inspection in June 2013 were reviewed. At the time of the inspection, Rancho Seco was utilizing Emergency Plan (Change 6), Rev. 1, which is the same Emergency Plan (EP) and revision that was in use at the time of the previous ISFSI inspection. As such, the effectiveness of the site's emergency response has not been reduced during this period.

A select number of EP drill and exercise packages from 2013 through 2016 were selected for additional review. Rancho Seco's EP, Section 7.3, Drills and Exercises, requires the licensee to conduct annual drills in order to exercise site fire and medical preparedness and to conduct a biennial exercise that includes response activities by the entire site. The inspector verified that the annual drills had been performed for the period of 2013 through 2015 in compliance with the EP and 10 CFR 72.32(a)(12) requirements. The drill packages selected by the inspector for review included a security exercise conducted on December 11, 2013, fire/medical exercises conducted several times (multiple security shifts) from December 24-31, 2013, a fire/medical exercise conducted

on June 19, 2014, a security drill conducted on November 4-5, 2014, a site exercise conducted on October 23, 2015, a fire and security exercise on November 24-25, 2015, and a fire and security table-top exercise conducted on May 3-4, 2016. Typical exercise and drill documentation package maintained by the licensee included a description of the drill that was conducted, a timeline, a list of agencies contacted or participating in the exercise or drill, and a final synopsis. Herald Fire Department participated in the medical, fire and security drills. The inspector concluded that the EP exercises and drills were performed satisfactorily and in accordance with the site's procedure.

.3 Conclusions

The licensee was conducting quality assurance audits of all site programs, including those impacting the ISFSI program. A review of 29 audit reports determined that the Quality Assurance Program was covering a broad range of areas. Issues identified during the audits were entered into the Rancho Seco corrective action program for resolution. Selected condition reports in the corrective action program were reviewed for the period June 2013 through May 2016. A wide range of conditions had been identified and resolved. Resolutions by the licensee of the selected condition reports were appropriate for the safety significance of the identified issues. No adverse trends were identified during the review.

Radiation levels around the ISFSI pad were consistent with site quarterly surveys and area monitoring results. Radiation data reviewed from the calendar year 2013, 2014, and 2015 Annual Radiological Environmental Operating Reports indicated that radiation levels offsite were in compliance with 10 CFR 72.104.

Since the last NRC ISFSI inspection (June 2013), Rancho Seco had not revised its ISFSI license or FSAR. The latest revision, Rev. 4, was submitted to NRC on June 30, 2010.

The ISFSI License SNM-2510, Technical Specification 5.5.3 requirements for daily horizontal storage module roof temperature monitoring/vent inspections were performed as required. No temperature issues with the casks were identified during the review of selected records.

There were no changes to the licensee's emergency planning program since the last NRC inspection in June 2013. The inspector verified that the required annual drills and biennial exercises with the specific focus areas had been occurring onsite periodically since the last ISFSI inspection from June 2013 through May 2016. These drills and exercises were reviewed by the inspector and determined to be compliance with the emergency plan and 10 CFR 72.32 (a)(12) requirements.

2. Review of 10 CFR 72.48 Evaluations (60857)

.1 Inspection Scope

The licensee's 10 CFR 72.48 screenings and evaluations that were performed since the last NRC routine ISFSI inspection were reviewed to determine compliance with regulatory requirements.

.2 Observations and Findings

The licensee utilized Procedure RSNAP-091, "Safety Review of Proposed Changes, Tests, and Experiments," Rev. 0 to perform the 10 CFR 72.48 and 10 CFR 50.59 safety screenings and evaluations. A list of modifications to the 10 CFR Part 50 and 10 CFR Part 72 programs was provided by the licensee for review. The NRC inspector reviewed 16 of the 10 CFR 72.48 and 10 CFR 50.59 screenings. The licensee generated 13 safety evaluations based on the 10 CFR 72.48 and 10 CFR 50.59 screening results. The inspector reviewed all 13 evaluations. The changes being made and evaluated at the Rancho Seco ISFSI included multiple changes to the Physical Protection Plan, an evaluation of the changes to the ISFSI SAR, Rev. 4, changes made to RADSAR Amendment 2, various procedure changes, and the erection of a 40 by 100 foot fuel transfer equipment storage building in close proximity (but outside 100 meters) to the ISFSI. The safety evaluations concluded that none of the proposed changes required NRC approval.

.3 Conclusions

All required safety screenings and safety evaluations had been performed in accordance with the licensee's procedures and requirements of 10 CFR 72.48. All screenings and safety evaluations reviewed were determined to have been adequately evaluated.

3. Exit Meeting

The inspector reviewed the scope and findings of the inspection during an exit conducted on May 18, 2016.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee Personnel

D. Tallman, Manager, Rancho Seco Assets
E. Ronningen, Advisor, former Superintendent, Rancho Seco Assets
C. Formhacs, Security Project Manager
R. Gaines, Dosimetry Technician
D. Koontz, Project Supervisor

INSPECTION PROCEDURES USED

IP 60858 Away-From-Reactor ISFSI Inspection Guidance
IP 60857 Review of 10 CFR 72.48 Evaluations

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Discussed

None

Closed

None

LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ALARA	as low as reasonably achievable
CFR	Code of Federal Regulations
DNMS	Division of Nuclear Materials Safety
DSC	Dry Shielded Canister
FSAR	Final Safety Analysis Report
GTCC	Greater Than Class C
HSM	Horizontal Storage Module
IP	Inspection Procedure
ISFSI	Independent Spent Fuel Storage Installation
NRC	U.S. Nuclear Regulatory Commission
NUHOMS	NUTECH Horizontal Modular Storage
OSL	optically stimulated luminescent
PDQ	Potential Deviation from Quality
RADSAR	Radioactive Material Storage and Decommissioning Safety Analysis Report
REMP	Radiological Environmental Monitoring Program
RP	radiation protection

D. Tallman

-2-

Should you have any questions concerning this inspection, please contact Mr. Eric J. Simpson at 817-200-1553 or the undersigned at 817-200-1197.

Sincerely,

/RA/

Jack E. Whitten, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

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Supplemental Information

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See next page

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DATE	6/17/16	6/17/16	6/17/16	

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Letter to Dan Tallman from Jack Whitten dated June 17, 2016.

SUBJECT: RANCHO SECO FACILITY AND INDEPENDENT SPENT FUEL STORAGE
INSTALLATION (ISFSI) INSPECTION REPORT 05000312/2016001 AND
07200011/2016001

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