

December 4, 1984

Docket Nos. 50-250
and 50-251

Distribution	Docket file	
NRC PDR	Local PDR	ORB1 RDG
Memo file	HDenton	DEisenhut
CParrish	DMcDonald	OELD
ACRS (10)	EJordan	JPartlow
PMcKee		

MEMORANDUM FOR: Division of Project and Resident Programs, Region II

THRU: Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

FROM: Daniel G. McDonald, Project Manager
Operating Reactors Branch #1
Division of Licensing

SUBJECT: PERFORMANCE EVALUATION FOR SYSTEMATIC ASSESSMENT OF
LICENSEE PERFORMANCE (SALP) FOR FLORIDA POWER AND LIGHT
COMPANY'S (FP&L) TURKEY POINT PLANT UNITS 3 AND 4 - JULY
1983 TO OCTOBER 1984

Enclosed is the NRR input for the SALP report for FP&L in the functional area of licensing activities related to Turkey Point Plant Units 3 and 4. Staff personnel who have had substantial contact and involvement with FP&L provided the basis for the input. In addition to licensing actions handled by NRR, licensing issues being handled ~~to~~ by the Region are also included. A draft was circulated to all the NRR Divisions for comments. All comments received were considered in the final version. As discussed in the enclosure, our evaluation was conducted according to NRR office letter No. 44 dated January 3, 1984, and NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

/s/DGMcDonald

Daniel G. McDonald, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosure:
Input for SALP Report

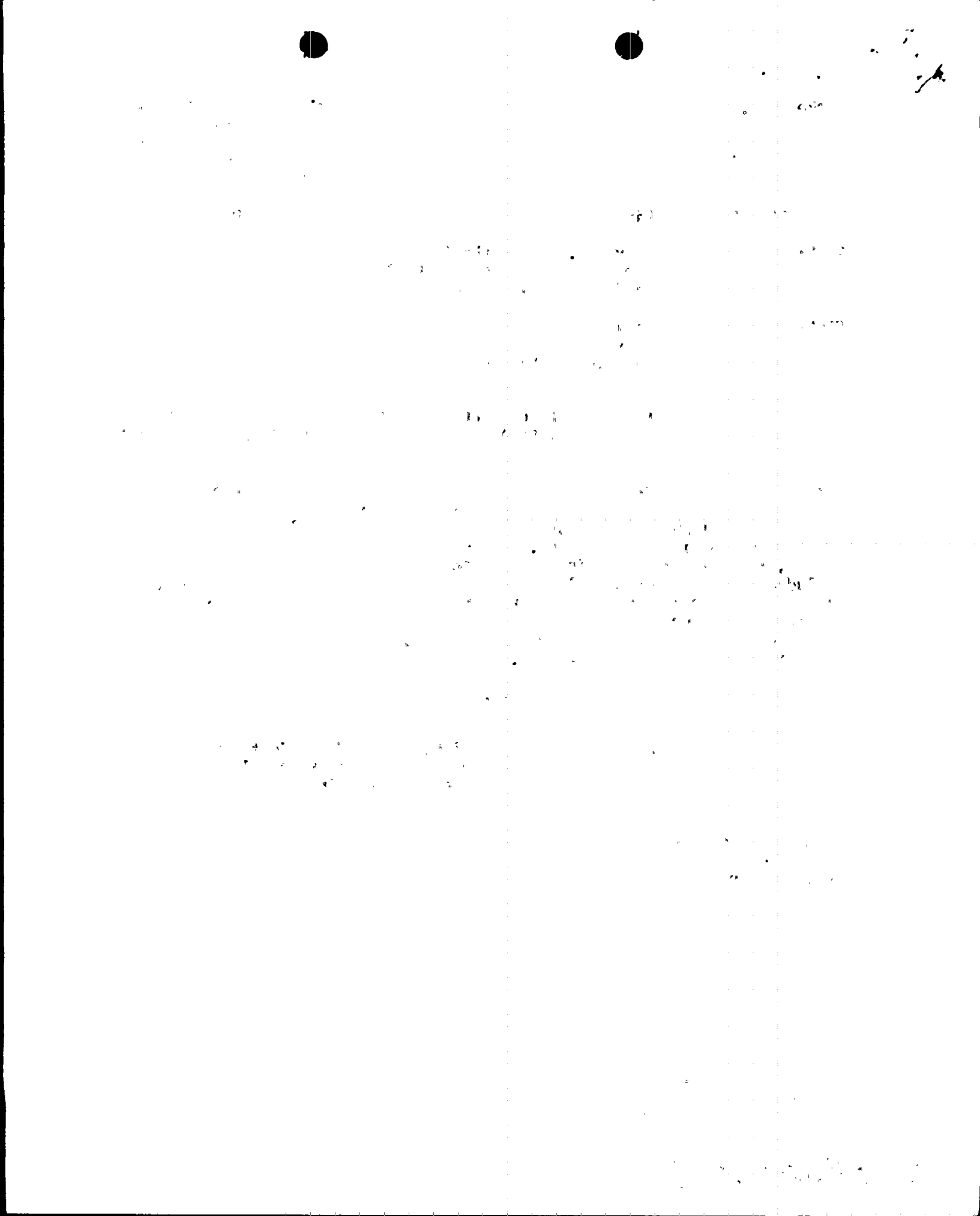
cc w/enclosure:
D. Eisenhut

ORB#1 DL
DMcDonald/ts
12/03/84

C-ORB#1:DL
SVarga
12/3/84

AD:OR:DL
GLamas
12/3/84

8412190460 841204
PDR ADCK 05000250
PDR



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



Docket Nos. 50-250
and 50-251

FACILITY: Turkey Point Plant Units 3 and 4
LICENSEE: Florida Power and Light Company
EVALUATION PERIOD: July 1, 1983 to October 31, 1984
PROJECT MANAGER: Daniel G. McDonald, Jr.

I. INTRODUCTION

This report contains NRR's input to the SALP review for the Turkey Point Plant Units 3 and 4. The assessment of the licensee's performance was conducted according to NRR Office Letter No. 44, NRR Inputs to SALP Process, dated January 3, 1984. This Office Letter incorporates NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

II. SUMMARY

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (Category 1, 2 or 3) based on a composite of a number of attributes. The single final rating to be tempered with judgment as to the significance of the industrial elements.

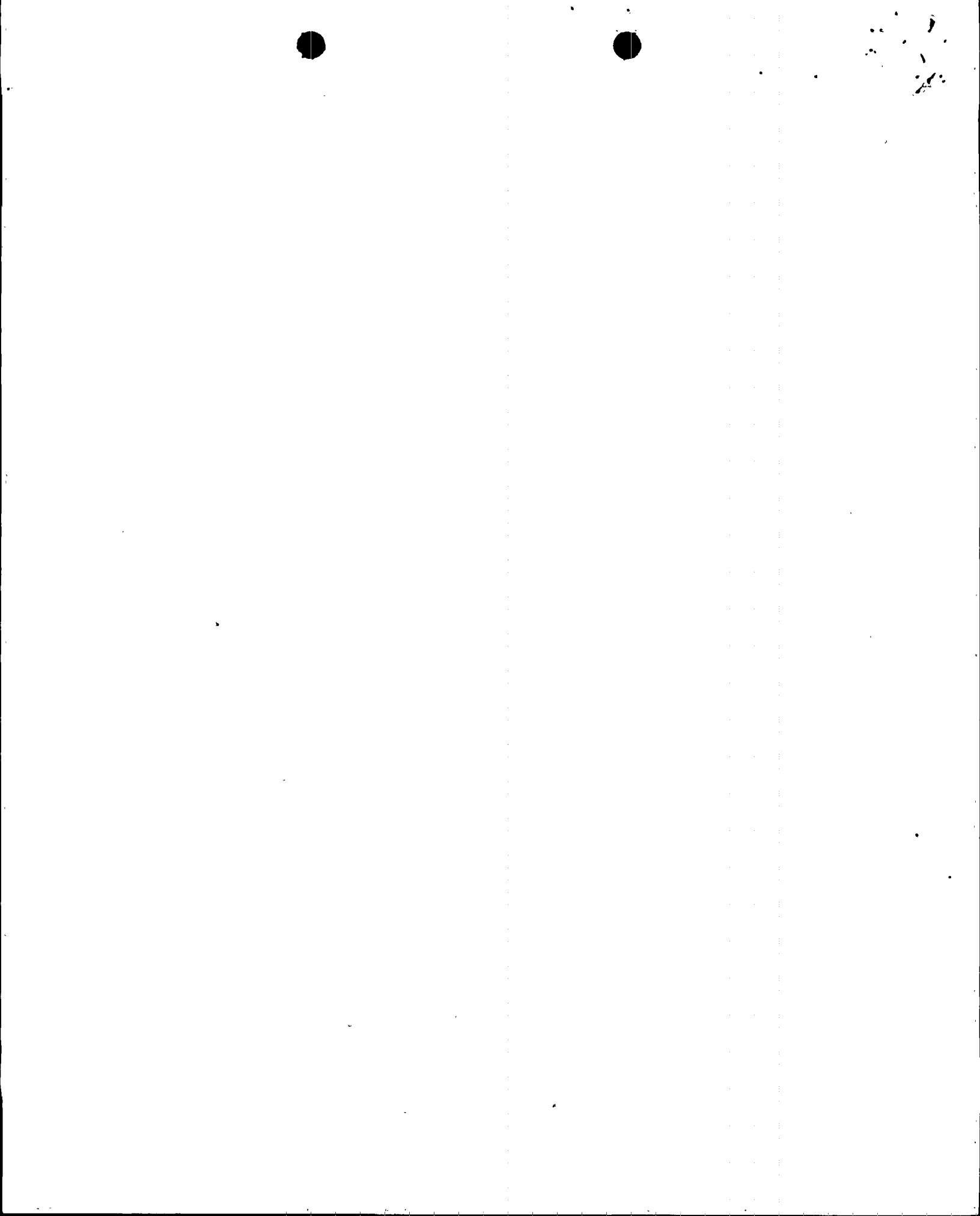
Based on this approach, the performance of Florida Power and Light Company in the functional area - Licensing Activities - is rated Category 1.

III. CRITERIA

The evaluation criteria used in this assessment are given in NRC Manual Chapter 0516 Appendix, Table 1, Evaluation Criteria with Attributes for Assessment of Licensee Performance.

IV. METHODOLOGY

This evaluation represents the integrated inputs of the Operating Reactor Project Manager (ORPM) and those technical reviewers who expended significant amounts of effort on the Turkey Point Plant Units 3 and 4 licensing actions during the current rating period. Using the guidelines of NRC Manual Chapter 0516, the ORPM and each reviewer applied specific evaluation criteria to the relevant licensee performance attributes, as delineated in Chapter 0516, and assigned an overall rating category (1, 2 or 3) to each attribute. The reviewers included this information as part of each Safety Evaluation Report transmitted to the Division of Licensing. The ORPM, after reviewing the inputs of the technical reviewers, combined this information with his own assessment of licensee performance and, using appropriate weighting factors, arrived at a composite rating for the licensee. This rating also reflected the comments of the NRR Senior



Executive assigned to the Turkey Point Plant Units 3 and 4 SALP assessment. A written evaluation was then prepared by the ORPM and circulated to NRR management for comments which, if provided, were incorporated in the final draft.

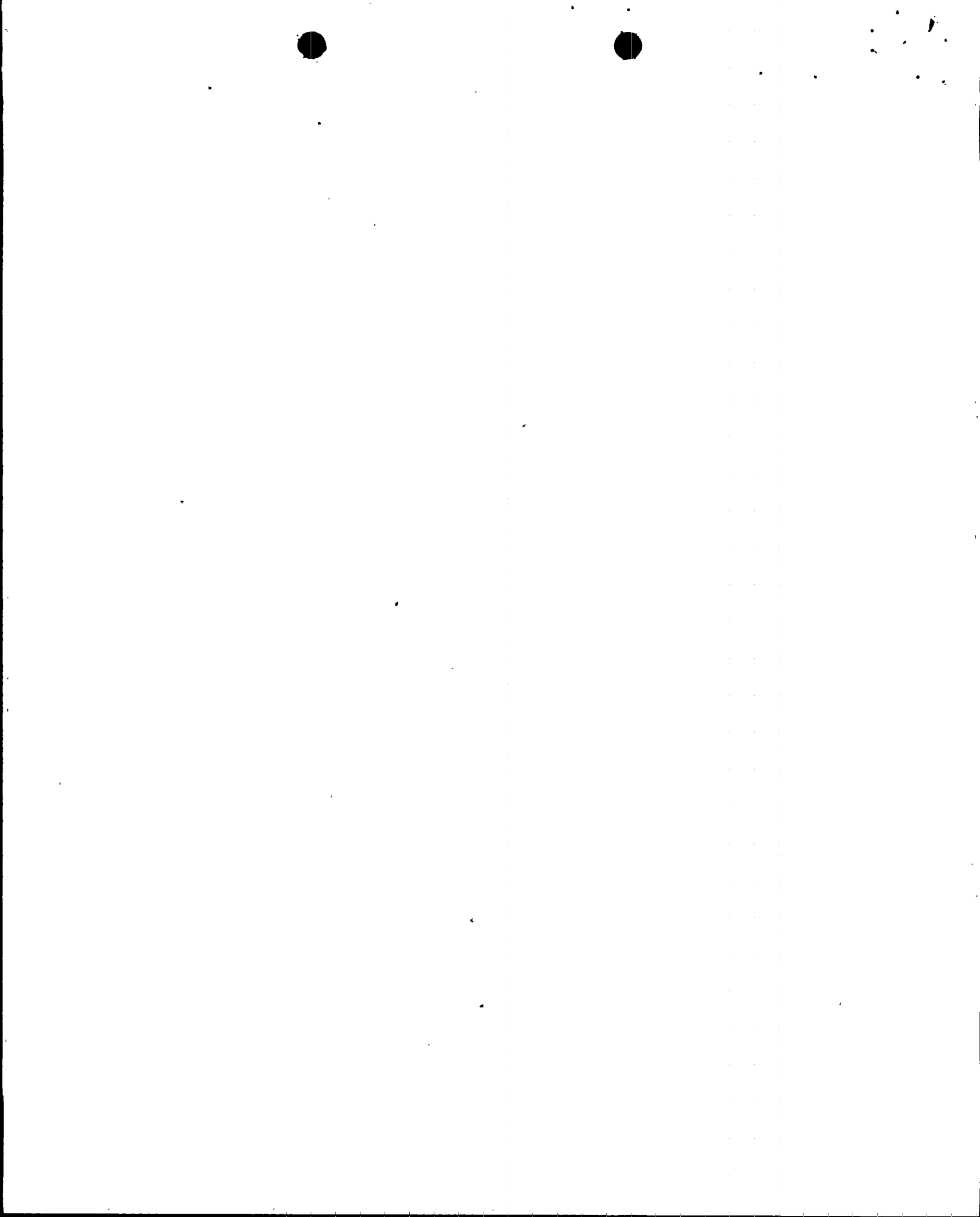
The basis for this appraisal was the licensee's performance in support of licensing actions that were either completed or had a significant level of activity during the current rating period. There were a total of 84 active actions at the beginning of the rating period for the Turkey Point Plant. Actions were added to the multi-plant and plant specific actions for a total of 156 actions by the end of the rating period. We have closed 96 actions during the rating period and have 60 active actions at the end of this rating period. These actions and a partial list of completions consisting of amendment requests, exemption requests, responses to generic letters, TMI items, and licensee initiated actions are:

54 Multi-Plant Actions (30 complete). Some of the completed actions in this category are:

- Control of Heavy Loads - Phase 1 (C-10)
- Appendix I (RETS) Technical Specifications (A-02)
- Mechanical Snubber Technical Specifications (B17 and B22)
- Environmental Qualification of Electrical Equipment (B-60)
- Alternate Shutdown - Appendix R (B-41)
- Degraded Grid Technical Specifications (B-23)
- Pressurized Thermal Shock (B-73)
- Vent and Purge Valve Operability (B-25)
- NUREG-0737 Technical Specifications - Generic Letter 82-16 (B-72)
- NUREG-0737 Technical Specifications - Generic Letter 83-37 (B-83)

64 Plant Specific Actions (48 completed). Some of the completed actions in this category are:

- ECCS Single Failure Technical Specifications
- Fire Protection - Appendix R
- Safety System Walkdown Technical Specifications
- Fuel Design (OFA/WABA) Technical Specifications
- Operational Limits ($F_{\Delta H}/F_Q$) Technical Specifications



- RHR Emergency Technical Specifications
- Reactor Vessel Material Data
- Fuel Enrichment Technical Specifications
- Electrical Design Changes
- Safety-Related Snubber Technical Specifications

38 TMI (NUREG-0737) Actions (18 completed). Some of the completed actions in this category are:

- I.C.I.2.A Inadequate Core Cooling
- II.B.3 Post Accident Sampling
- II.D.3.4 Control Room Habitability
- II.K.2.17 Potential Voids in the RCS

V. ASSESSMENT OF PERFORMANCE ATTRIBUTES

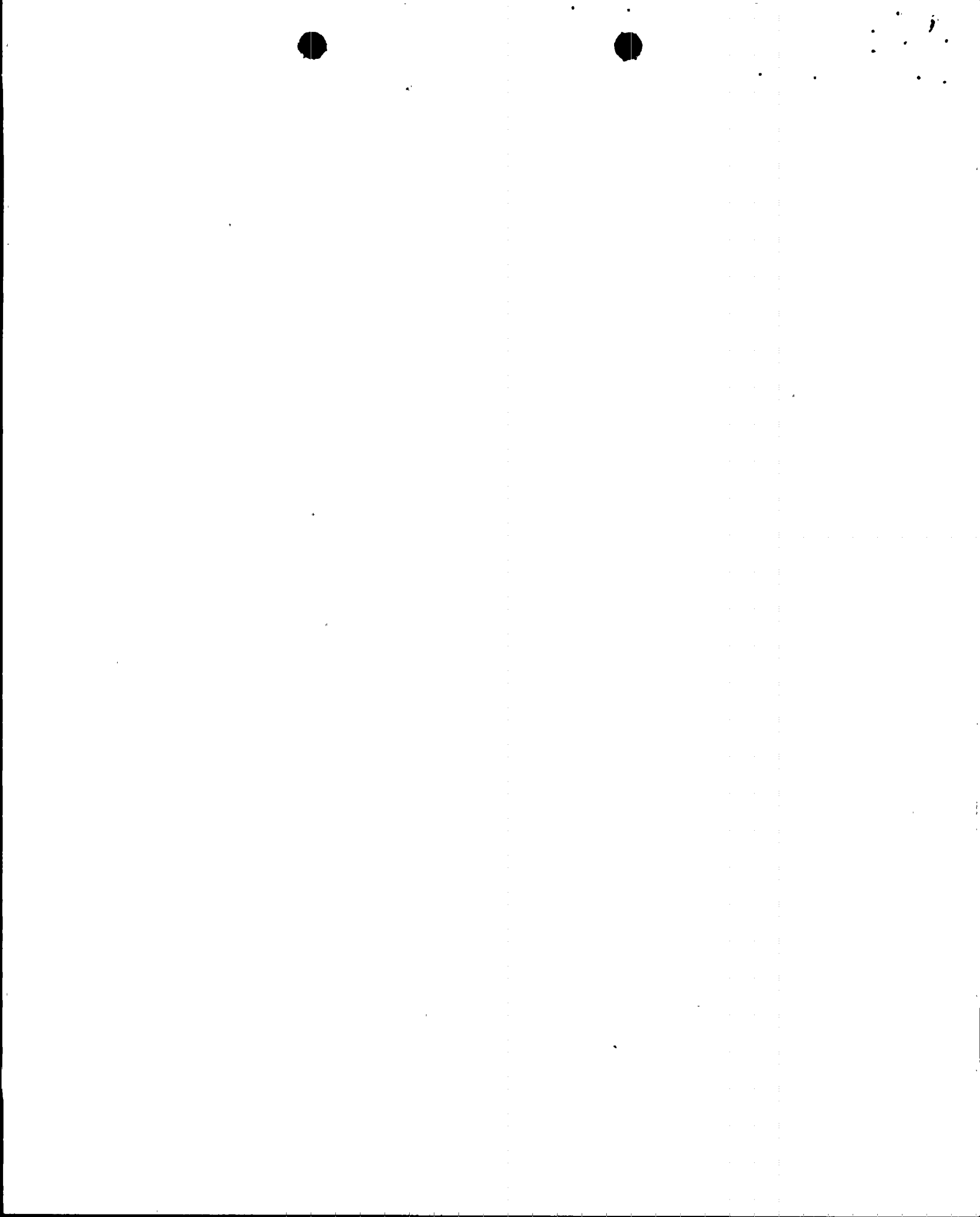
The licensee's performance evaluation is based on a consideration of four of the seven attributes specified in NRC Manual Chapter 0516. These are:

- Management Involvement and Control in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Responsiveness to NRC Initiatives
- Staffing

For the remaining three attributes (enforcement, reportable events, and training and qualification effectiveness), no basis exists for an NRR evaluation for the functional area of Licensing Activities.

A. Management Involvement and Control in Assuring Quality

We have noted in our previous assessment, that there has been effective attention and an aggressive effort given by management toward nuclear safety in the licensing area. The concern perviously identified in the area of requesting amendments under the guidelines of 10 CFR 50.91, as amended pursuant to Public Law 97-415, has been corrected. This is evidenced by the detailed No Significant Hazards Consideration findings provided with requests for amendments. We have completed 32 of the 34 amendments requested since issuance of the 10 CFR 50.91 guidelines. Two of the requests have been petitioned and Final No Significant Hazards Consideration determinations were made. The completion of 96 actions during this evaluation period provides strong evidence of management involvement in the prior planning and assignment of priorities. One goal



established with the licensee at the beginning of this rating period was to complete the oldest outstanding multi-plant and plant specific actions. Of the 46 active actions at the beginning of the period, 40 have been closed. The remaining 6 require action by the NRC staff for final resolution.

An example of specific licensing actions where the licensee's management involvement was evidenced was in the Environmental Qualification of Electrical Equipment. The submittal included well stated, controlled and explicit procedures for the control of equipment qualification activities. It is also significant that all the electrical equipment important to safety for Unit 4 has been qualified and only 9 switches remain to be qualified for Unit 3. Detailed Justifications for Continued Operation (JCOs) were provided for these 9 switches.

Detailed discussions, at the licensee's request, are held with FPL and NRC management to assure that licensing actions are getting the appropriate priority and resources necessary to meet changing safety needs which further demonstrates management involvement and control by the licensee.

On the basis of these observations, a rating of 1 is assigned to this attribute.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

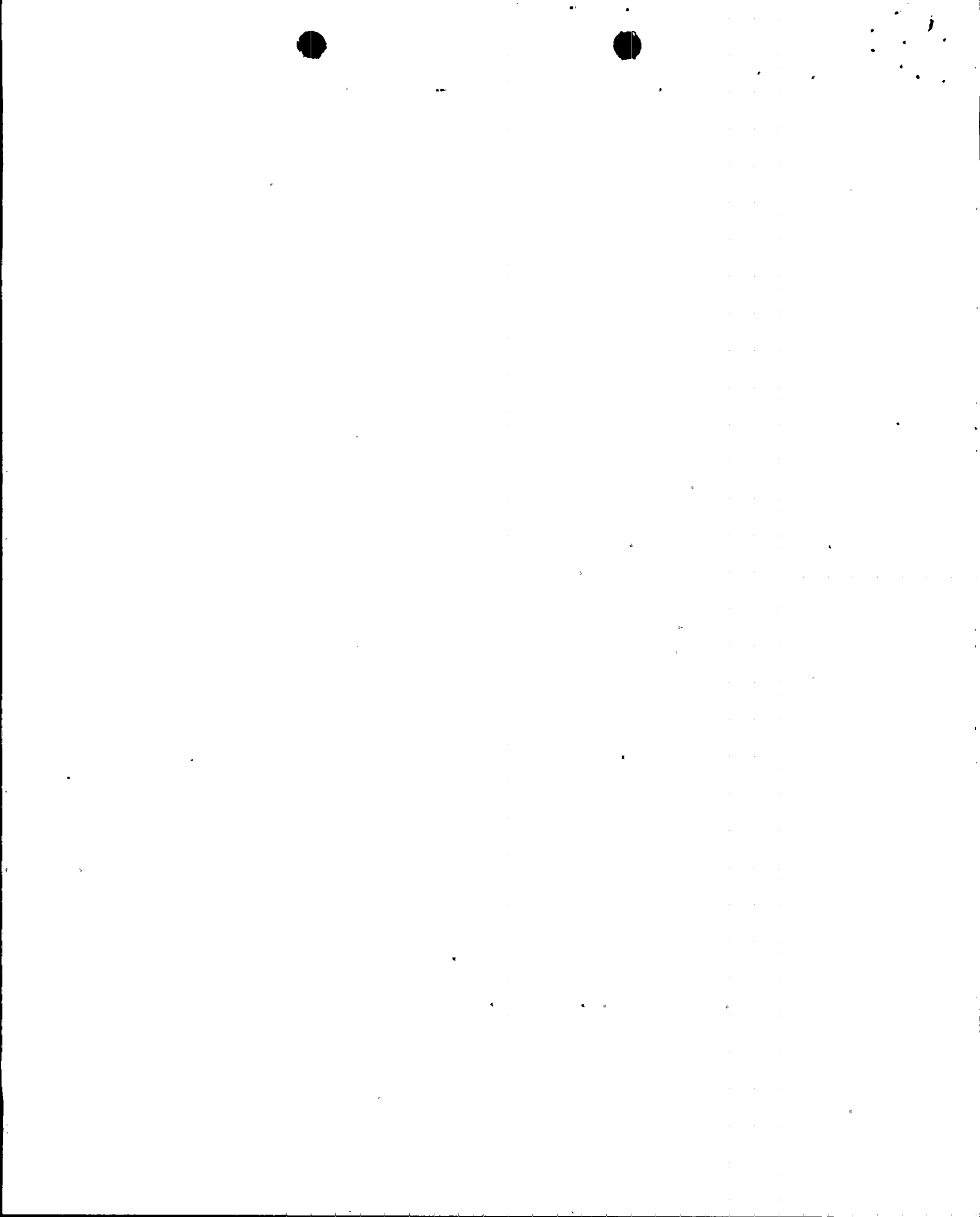
The increased interaction of the licensee, including frequent visits and management discussions/meetings with the NRC staff, have resulted in clear understanding of safety issues and sound technical approaches are taken by the licensee's technical staff toward their resolution. Conservatism is being exhibited in relation to significant safety issues on a routine basis. Thoroughness in the approach to the technical issues has been demonstrated by the number and complexity of the licensing actions completed during this period.

Consistently sound technical justification is provided by the licensee for deviations from staff guidance. The improved communications between the licensee and NRC staff has been beneficial to both in the processing of licensing actions and minimizing the need for additional information.

On the basis of these observations, a rating of 1 is assigned to this attribute.

C. Responsiveness to NRC Initiatives

The initial submittals and responses to our requests for information are consistently meeting the projected schedules or a sound justification and a revised schedule are provided. We have noted that the corporate structure of FPL has a large number of organizational units requiring internal coordination and a cooperative attitude to achieve timely resolution of safety issues in the licensing area. A significant improvement has been noted in the licensee's technical staff's attitude in responding to our requests concerning safety issues. We are consistently achieving timely resolutions of safety issues in the licensing area as a result of this improvement.



We are aware of the extensive efforts and resources currently involved in responding to the NRC requirements relating to TMI, Appendix R, Performance Enhance Program (PEP) Orders and other Commission actions. Individually, each of the requirements are a subset of the total safety effort. Over-emphasis or focusing on one specific area could result in the overall safety of the plant being degraded. Although this has not been a problem for this rating period, we point it out to emphasize the need for establishing relative priorities and the integration of all safety activities at the plant so that we will all have a common basis for understanding constraints, needs and priorities. Thus, any revised schedules or extensive time needed for responding to NRC initiatives will require that a discussion of the priority, impact and integration with all ongoing safety efforts be included in the justification.

On the basis of these observations, a rating of 1 is assigned to this attribute.

D. Enforcement

No basis exists for an NRR evaluation of this attribute.

E. Reportable Events

No basis exists for an NRR evaluation of this attribute.

F. Staffing

The licensee has increased the licensing staff to assure timely responses and the quality of their submittals in relation to licensing actions. In addition, the technical staff has increased at the site which enhances the quality and timeliness of the licensee's submittals.

On the basis of these observations, a rating of 1 is assigned to this attribute.

G. Training and Qualification Effectiveness

No basis exists for an NRR evaluation of this attribute.

VI. CONCLUSION

A complete performance rating of 1 has been assigned by NRR for the SALP evaluation for the current rating period.



INFORMATION TO BE ADDED TO
SECTION V OF THE SALP REPORT
"SUPPORTING DATA AND SUMMARY"

1. NRR/Licensee Meetings

Masonry Wall Design Review (IEB 80-11)	8/18-19/83
Integrated Living Schedules	6/22/84
Reactor Materials Surveillance Programs	7/13/84
Technical Specifications Upgrade	8/23/84
Proposed Spent Fuel Pool Expansion	9/10/84
Detailed Control Room Design Review	10/2/84

2. NRR Site Visits/Meetings

Masonry Wall Design (IEB 80-11)	8/16/83
ALARA Data Gathering	2/7-10/84
Detailed Control Room Design Review	4/2-6/84
Electrical Design Review	6/5-6/84
Inadequate Core Cooling Audit	8/7-8/84
NRR Director Visit and Briefing	10/5/84

3. Commission Briefings

None

4. Schedular Extension Granted

Appendix R, Section III.A	3/21/84
Emergency Preparedness Exercise	9/20/84

5. Reliefs Granted

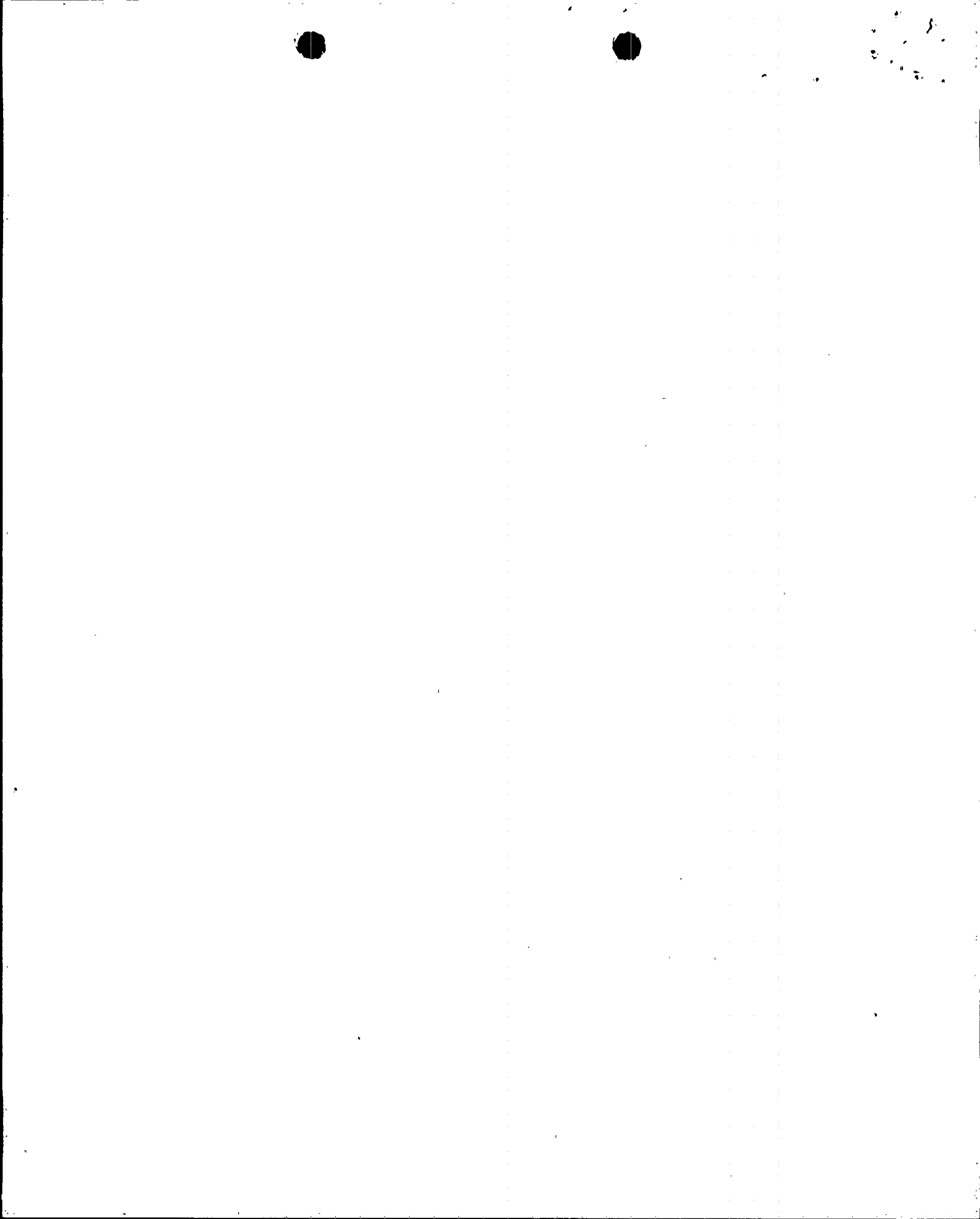
None

6. Exemptions Granted

Inservice Inspection Program - Code Upgrade	3/1/84
Appendix R, 21 Granted to Sections III.G, III.J and III.O	3/27/84

7. Licensing Amendments Issued

<u>Amendment Numbers</u>	<u>Title</u>	<u>Date</u>
96/90	Mechanical Snubber Requirements	10/14/83
97/91	Safety System Walkdown	10/26/83
98/92	Fuel Design (OFA/WABA)	12/9/83



<u>Amendment Numbers</u>	<u>Title</u>	<u>Date</u>
*99/93	Operational Limits ($F_{\Delta H}/F_Q$)	12/23/83
100/94	Appendix B Deletions	1/4/84
101/95	ECCS Single Failure	2/22/84
102/96	Safety Inspection Bypasses	4/13/84
103/97	Appendix I (RETS)	4/23/84
104/98	Degraded Grid	8/14/84
105/99	Appendix B - Groundwater/Env.	8/24/84
106/100	NUREG-0737 (GL 82-16)	8/27/84
107/101	Safety-Related Snubber-Tables	8/27/84
108/102	Control of Heavy Loads	8/29/84
*109/103	Fuel Enrichment	9/5/84
110/104	NUREG-0737 (GL 83-37)	10/17/84

8. Emergency Technical Specifications Issued

<u>Amendment Numbers</u>	<u>Title</u>	<u>Date</u>
95/89	Maximum Reactor Coolant Activity	8/31/83

9. Orders Issued

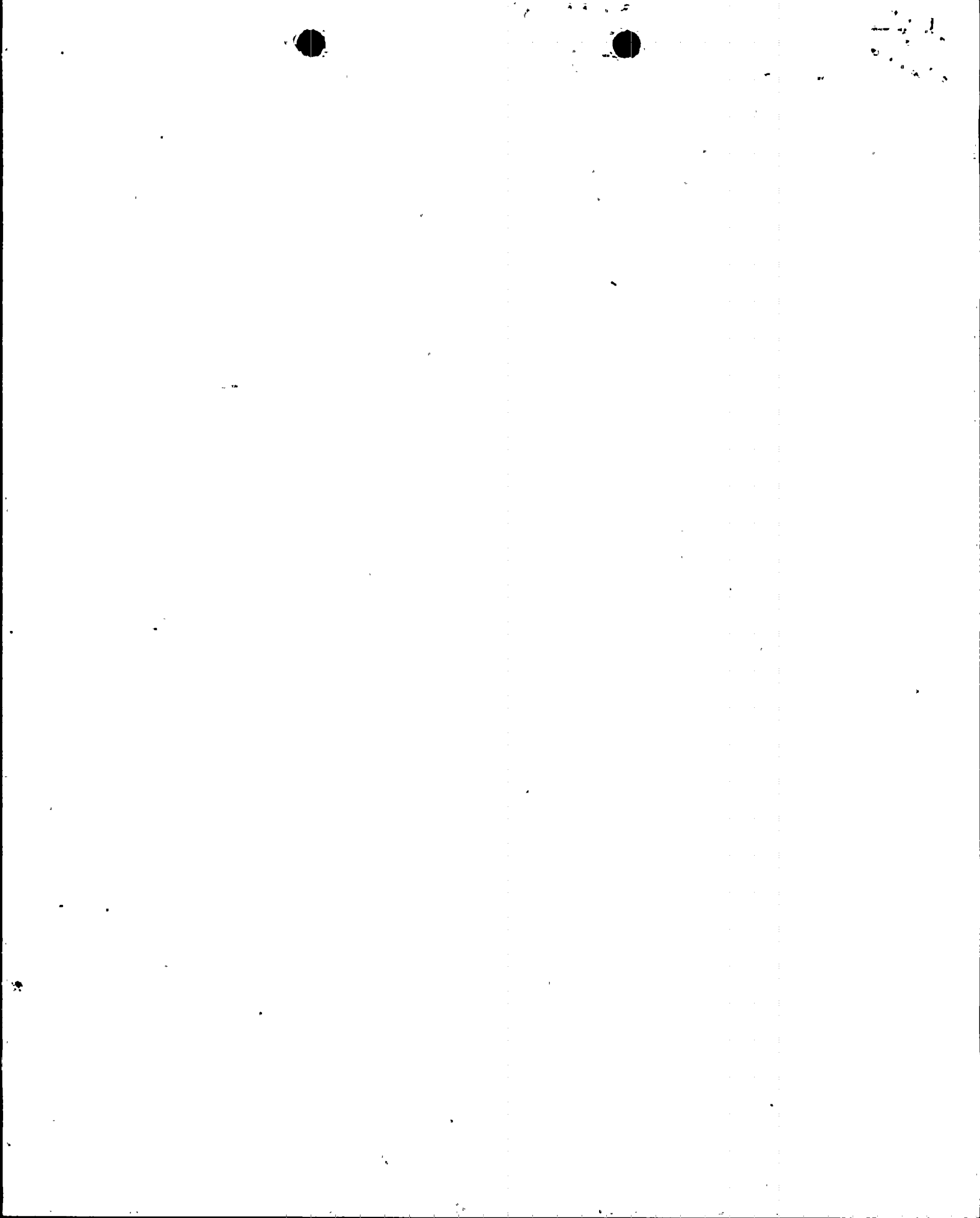
Confirmatory Order - Implementation of Supplement 1 to NUREG 0737 Items 2/23/84

Order - Modify Technical specification 3.4.1.b on an Interim Basis 3/14/84

10. NRR/Licensee Management Conferences

No formal conferences, however several discussions were held with licensee management to assure appropriate priority and resources are being expended to meet changing safety needs.

*Request for hearing and petition for leave to intervene. Hearing Boards have been established.





UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

November 21, 1984

DISTRIBUTION
Docket File w/o encl.
ORB#1 Rdg w/o encl.
CParrish w/encl.
DMcDonald w/encl.

DOCKET No. 50-250
and 50-251

MEMORANDUM FOR: Docketing and Service Branch
Office of the Secretary of the Commission

FROM: Office of Nuclear Reactor Regulation

SUBJECT: FLORIDA POWER AND LIGHT
Turkey Point Plant Unit Nos. 3 and 4

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (6) of the Notice are enclosed for your use.

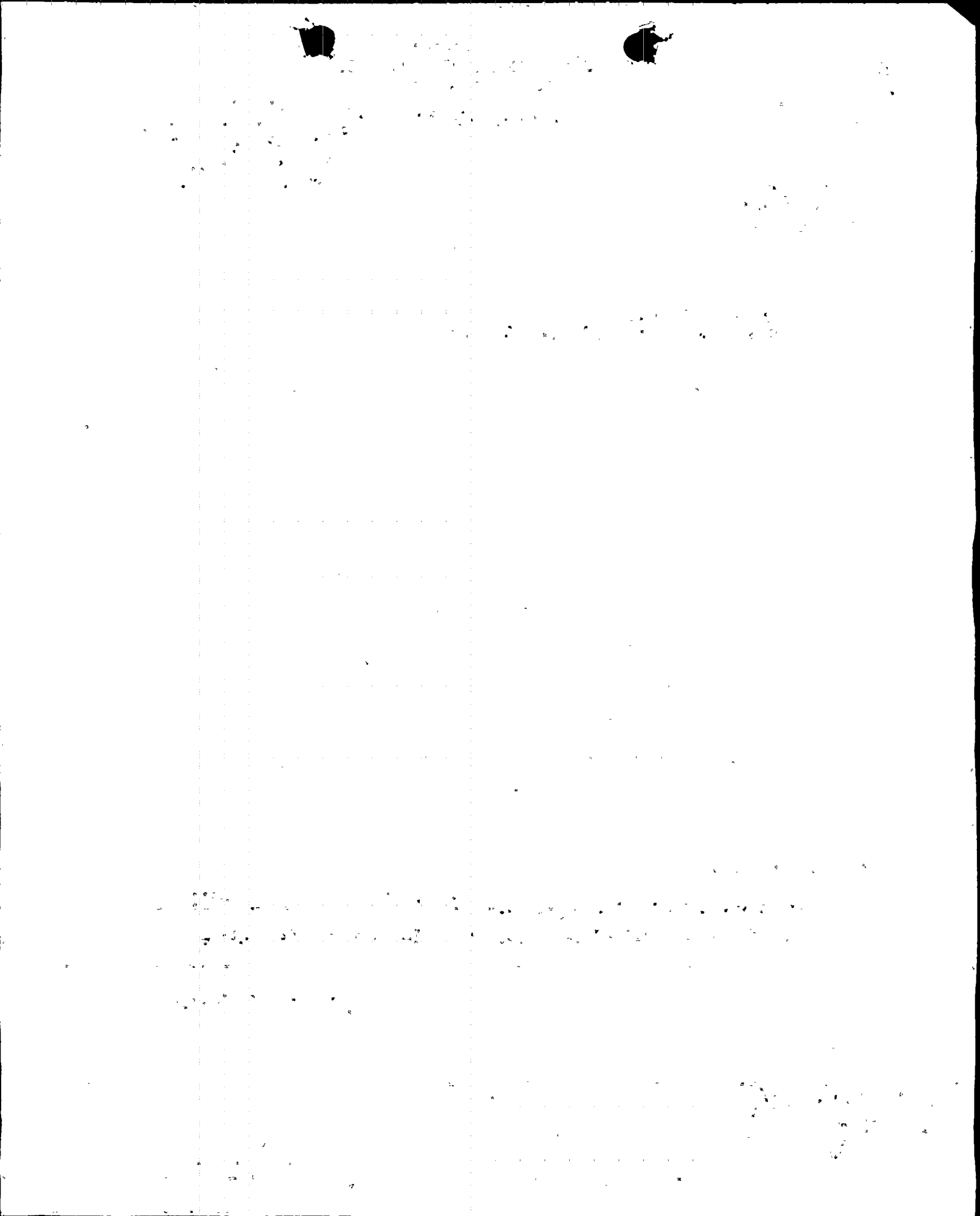
- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting of Relief.

Other: Notice dated November 21, 1984. RE: Spent Fuel Storage Facility
Loading Increase (TAC 54480/1). A complete package is enclosed.

Division of Licensing, ORB#1
Office of Nuclear Reactor Regulation

Enclosure:
As stated

OFFICE	ORB#1:DL					
SURNAME	CParrish:ps					
DATE	11/21/84					



November 15, 1984

DOCKET NO(S) 50-250
50-251
50-335
50-389

See attached list of addressees.

SUBJECT: TURKEY POINT PLANT, UNIT NOS. 3 AND 4, ST. LUCIE PLANT, UNIT NOS. 1 AND 2

The following documents concerning our review of the subject facility are transmitted for your information.

- Notice of Receipt of Application, dated _____.
- Draft/Final Environmental Statment, dated _____.
- Notice of Availability of Draft/Final Environmental Statement, dated _____.
- Safety Evaluation Report, or Supplement No. _____, dated _____.
- Notice of Hearing on Application for Construction Permit, dated _____.
- Notice of Consideration of Issuance of Facility Operating License, dated _____.
- Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards Considerations, dated _____.
- Application and Safety Analysis Report, Volume _____.
- Amendment No. _____ to Application/SAR dated _____.
- Construction Permit No. CPPR- _____, Amendment No. _____ dated _____.
- Facility Operating License No. _____, Amendment No. _____, dated _____.
- Order Extending Construction Completion Date, dated _____.
- Other (Specify) Forwards operating reports for May, June, August 1984; Combined Semi-annual Radioactive Effluent Release Report for the period January through June, 1984

Division of Licensing, ORB#3
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: w/enclosures
See next page

OFFICE	ORB#3:DL						
SURNAME	PKreutzer						
DATE	11.11.84						

1950



1950

1950

1950

1950

1950

1950



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

Distribution
Docket file wo/encl.
ORB#1 rdg. wo/encl.
CParrish w/encl.
DMcDonald w/encl.

November 14, 1984

DOCKET No. 50-250/251

MEMORANDUM FOR: Docketing and Service Branch
Office of the Secretary of the Commission

FROM: Office of Nuclear Reactor Regulation

SUBJECT: TURKEY POINT PLANT UNITS 3 AND 4

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (6) of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting of Relief.

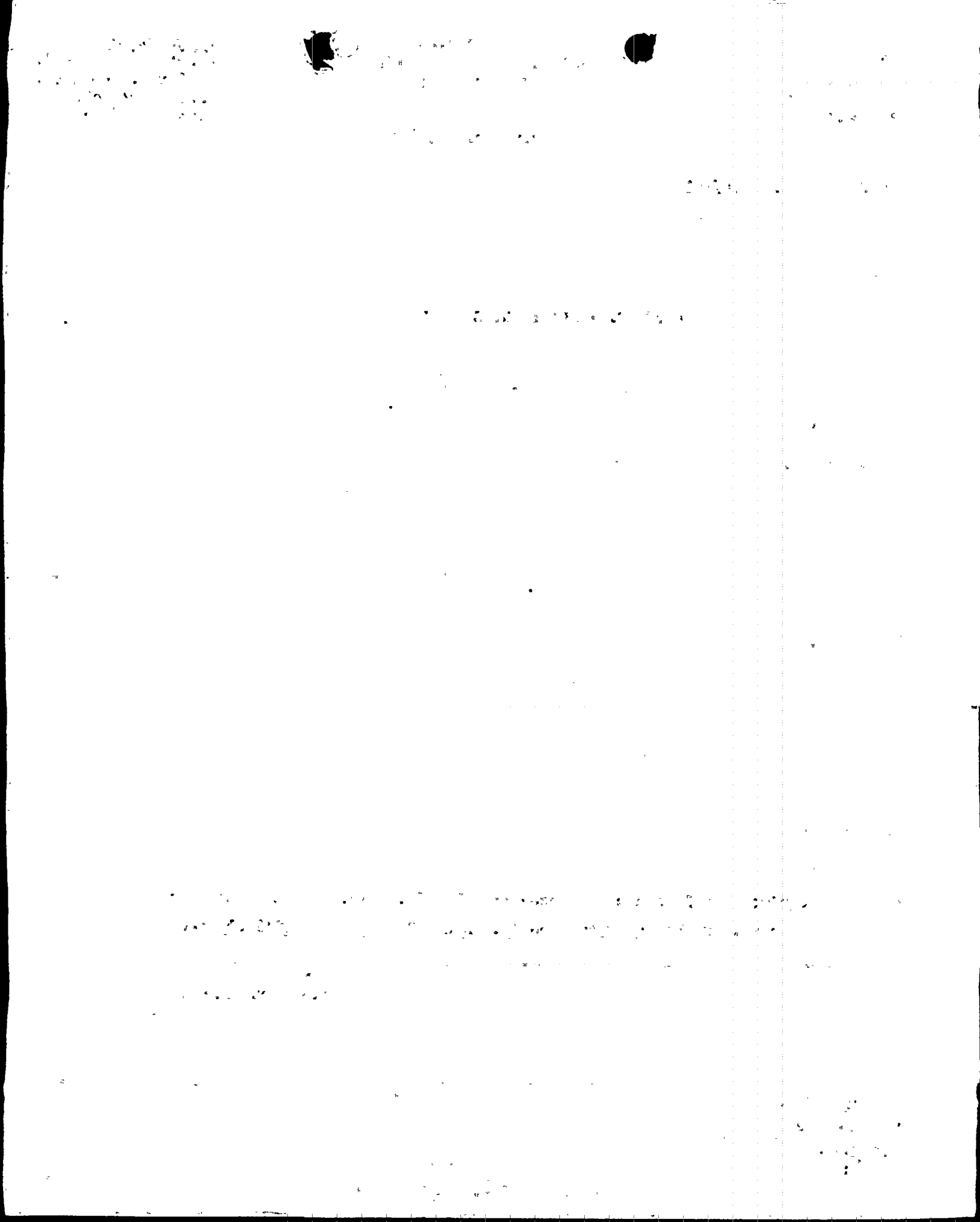
Other: Environmental Assessment dated November 14, 1984. Re: increased storage capacity for the spent fuel pools. A complete package will be forwarded.

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As stated

OFFICE	▶	ORB#1; DLO					
SURNAME	▶	CParrish/ts					
DATE	▶	11/14/84					

OFFICIAL RECORD COPY





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

October 2, 1984

DISTRIBUTION
Docket File w/o encl.
ORB#1 Rdg w/o encl.
CParrish w/encl.
DMcDonald w/encl.

DOCKET No. 50-250/251

MEMORANDUM FOR: Docketing and Service Branch
Office of the Secretary of the Commission

FROM: Office of Nuclear Reactor Regulation

SUBJECT: FLORIDA POWER AND LIGHT COMPANY
Turkey Point Plant, Unit Nos. 3 and 4

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (6) of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting of Relief.

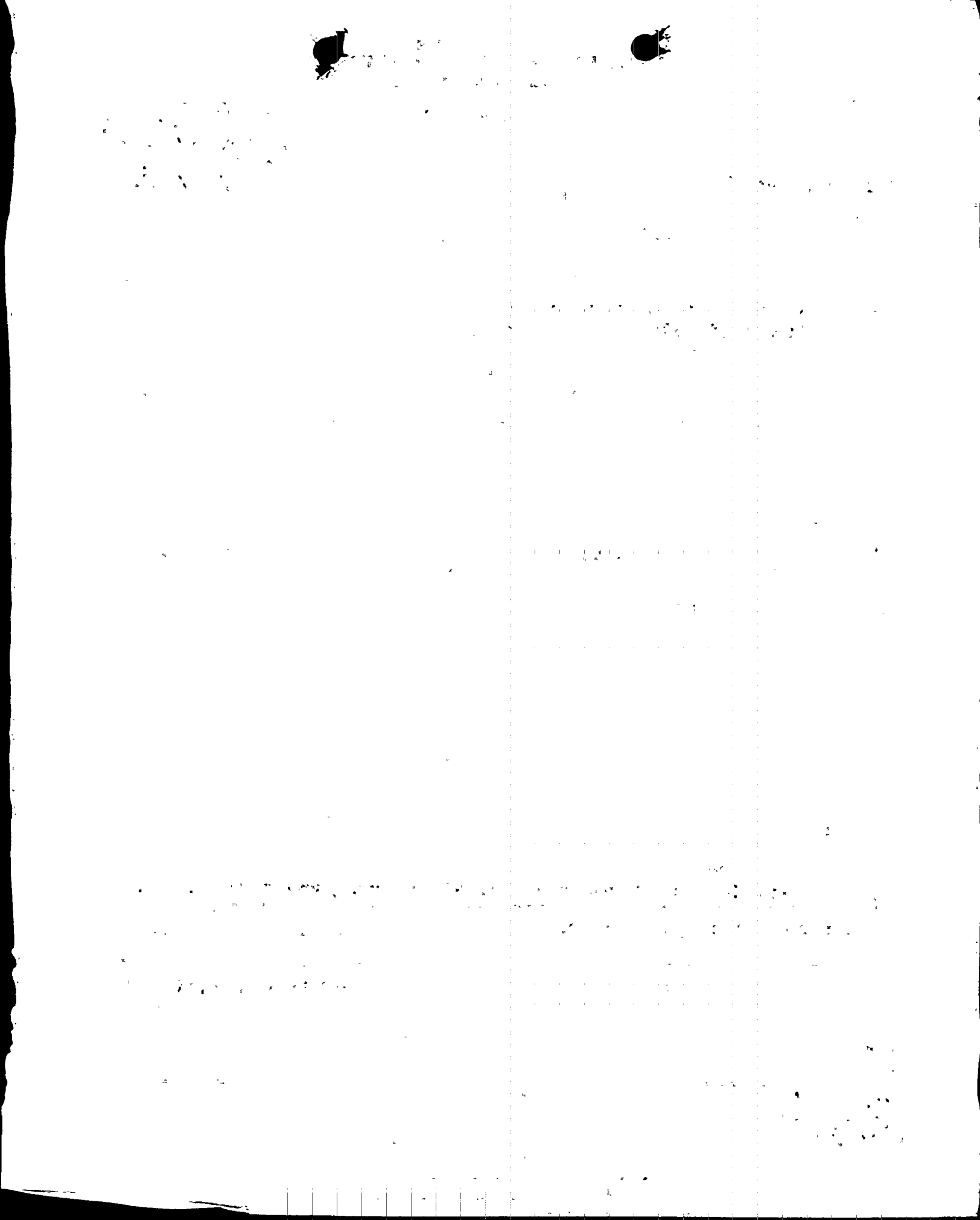
Other: Exemption dated September 20, 1984 RE: Emergency Preparedness Exercise.

Enclosed is a complete package.

Division of Licensing, ORB#1
Office of Nuclear Reactor Regulation

Enclosure:
As stated

OFFICE	ORB#1:DL					
SURNAME	CParrish;ps					
DATE	10/2/84					





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

September 20, 1984

DISTRIBUTION
Docket File w/o encl.
ORB#L Rdg w/o encl.
CParrish w/encl.
DMcDonald w/encl.

DOCKET No. 50-250
50-251

MEMORANDUM FOR: Docketing and Service Branch
Office of the Secretary of the Commission

FROM: Office of Nuclear Reactor Regulation

SUBJECT: FLORIDA POWER AND LIGHT COMPANY
Turkey Point Plant Units 3 and 4

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (6) of the Notice are enclosed for your use.

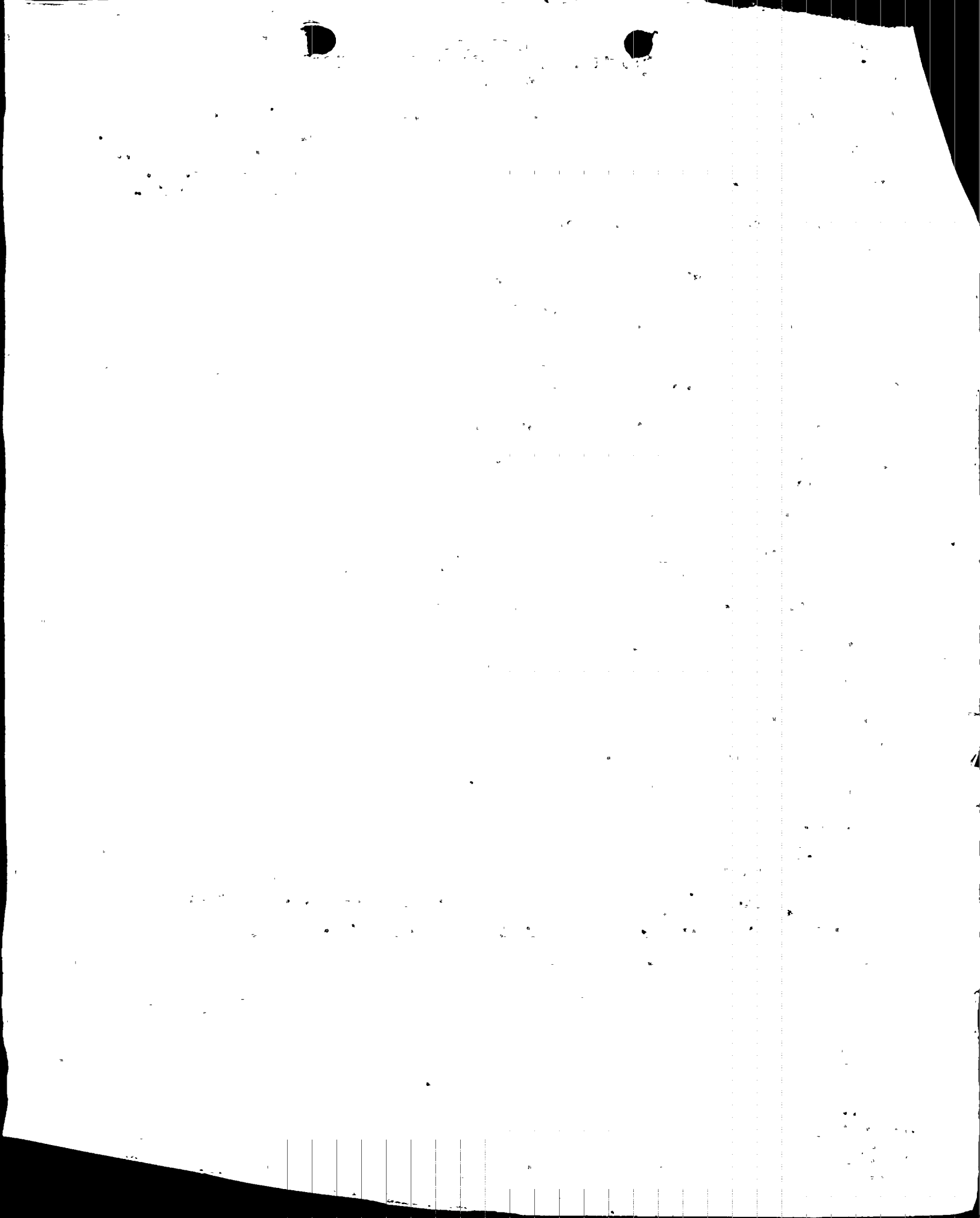
- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting of Relief.

Other: Notice of Environmental Assessment dated September 20, 1984 Re: Emergency Preparedness Exercise. Enclosed is a complete package.

Division of Licensing, ORB#1
Office of Nuclear Reactor Regulation

Enclosure:
As stated

OFFICE	▶ ORB#1:DL					
SURNAME	▶ CParrish:RS					
DATE	▶ 9/20/84					





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

September 7, 1984

DISTRIBUTION
~~Docket File~~ w/o encl.
ORB#1 Rdg w/o encl.
CParrish w/encl
DMcDonald w/encl.

DOCKET No. 50-250/251

MEMORANDUM FOR: Docketing and Service Branch
Office of the Secretary of the Commission

FROM: Office of Nuclear Reactor Regulation

SUBJECT: FLORIDA POWER AND LIGHT COMPANY
TURKEY POINT PLANT UNITS NOS. 3 AND 4

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed-copies (6) of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting of Relief.

Other: Notice dated September 5, 1984. Re: Fuel Storage U-235 Linear Loading
Increase. Enclosed is a complete package.

Division of Licensing,
Office of Nuclear Reactor Regulation

Enclosure:
As stated

OFFICE	ORB#1: DL					
SURNAME	CParrish/ts					
DATE	9/7/84					

OFFICIAL RECORD COPY

