".S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-322/78-16
Docket No. 50-322
License No. CPPR-95 Priority Category A
Licensee: Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801
Facility Name: Shoreham Nuclear Power Station, Unit No. 1
Inspection at: Shoreham, New York
Inspection conducted: October 24-27, 1978
Inspectors: A.D. Titl 11/16/78
A. D. Toth, Reactor Inspector date signed
Sition 11/16/25
J. P. Durr, Reactor Inspector date signed
A. E. Finkel, Reactor Inspector
Approved by: <u>April Mi Daniel</u> November 22, 1478
R. W. McGaughy, Chief, Projects Section date signed
Reactor Construction & Engineering Support Branch
Inspection Summary:
Inspection on October 24-27, 1978 (Report No. 50-322/78-16)
Areas Inspected: Routine, unannounced inspection by three regional based inspectors of work activities for the reactor building polar crane, calibration and trip settings of
switchgear equipment, reactor coolant pressure boundary pipe welding, diesel generator
installation, and electrical equipment installation; also, quality verification records for audits of electrical activities, qualification of QA/QC inspection personnel, elec-
trical equipment installation, circulating water intake and discharge canal/pipe, and
licensee action regarding bulletins/circulars/10 CFR 50.55(e) reports. The inspectors
also performed a plant tour-inspection, reviewed recirculating system questions expressed by an employee to NRC, reviewed licensee action on previous inspection findings, and
performed follow-up action as necessary to resolve questions which arose during the
course of inspection of the above areas. The inspection involved 72 inspector-hours on-

site by 3 NRC regional office based inspectors and 8 hours onsite by an NRC Region I supervisor. Results: Of the 10 areas inspected, no items of noncompliance were identified in 8 areas;

2 apparent items of noncompliance were identified in 2 areas. (Infraction-nonconforming shop welds on polar crane-Paragraph 4; Infraction-failure to maintain switchgear cleanliness-Paragraph 5.) 7903010048

DETAILS

1. Persons Contacted

Long Island Lighting Company

*D. F. Bednarczyk, QA Supervisor
D. M. Durand, Operating QA Engineer
*T. F. Gerecke, Engineering QA Manager
*R. Gutmann, Lead Startup Engineer
*K. Howe, General Superintendent of Construction
R. M. Kascask, Project Engineer (UNICO)
*J. M. Kelly, Field QA Manager
*L. C. Lilly, Site Manager (UNICO)
A. R. Muller, QA Engineer
E. Nicholas, QA Engineer
*J. P. Novarro, Project Manager
J. Rivello, Startup Manager

*A. W. Wofford, Vice President

Stone and Webster

*T Arrington, Superintendent, FQC
E. Barcomb, FQC Inspector
*R. Bernard, Senior Superintendent, FQC
J. Burgess, FQC Senior Engineer
*T. F. Burns, Materials Engineer
*R. S. Costa, QA Program Administrator
*C. A. Fonseca, Head-Site Engineering Office
*W. L. Kennedy, Director of Engineering
*C. B. Miczek, Senior Engineering Manager
J. Riess, Assistant Superintendent, Electrical (UNICO)
*W. R. Sheridan, Project Manager
C. Wright, Materials Engineer

Courter and Company

H. P. Anning, QC Supervisor

A. B. Czarnowski, Project Manager

- *D. W. Papa, QA Manager
- J. Schmit, QA Supervisor
- R. Scott, QA Engineer

General Electric Company

*J. M. Cockroft, QC Representative *W. A. Shanks, Site Manager

Hartford Steam Boiler I&I Company

G. F. Cocuzzo, Authorized Nuclear Inspector

In addition to the above, the inspectors interviewed various contractor supervisory, administrative and craft personnel during the course of the inspection relative to records retrieval, status of work and general site activities.

*denotes those present at the exit interview.

Long Island Lighting Company (LILCO) and Stone and Webster (S&W) personnel participate in the joint UNICO construction management organization mentioned in this report.

2. Plant Tour

The inspectors observed work activities in-progress, completed work, and plant status in several areas of the plant during general inspection of the plant. The inspectors examined work items for any obvious defects or noncompliance with regulatory requirements or license conditions. Particular note was taken of installed equipment condition, storage and protection practices, presence of cuality control inspectors and quality control evidence such as inspection records, material identification, nonconforming material identification, and equipment calibration tags. The inspector interviewed craft personnel, supervision, and quality inspection personnel as such personnel were available in thework areas. Where more detailed inspection of an area was conducted, the inspection scope and findings are described in other paragraphs of the report.

No items of noncompliance were identified during this general inspection effort.

3. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (322/78-03-02): Failure to maintain 200°F preheat on RHR pipe weld Ell-IC-017-FWS3 (Reference 322/ 78-06). The inspector verified that preheat controls are being implemented during the welding of large bore piping (see paragraph 3). This item is considered to be resolved.

(Closed) Noncompliance (322/78-12-02): Pipe break restraint weld joint angle. The licensee issued Nonconformance and Disposition Report No. 1835 which describes the noncomplying condition and prescribes the disposition to use "as is." The licensee has a previously qualified welding procedure P-3071 which incorporates the 30° weld bevel angle and essentially the same welding parameters. The use of this welding procedure would not necessitate the requalification of the welders. The licensee issued a memorandum on October 17, 1978, to all welding contractors to be aware of the requirements of the AWS D1.1 welding codes. Furthermore, he is reviewing all AWS D1.1 weld joints and techniques to preclude recurrence of a similar situation.

The inspector interviewed the piping and hanger supervisors to verify that they had received the October 17, 1978 memorandum and were aware of its contents.

The inspector examined the following documents relative to the above:

E&DCR-P3071

N&D-1835

Weld Technique Sheet W200A

Weld Procedure Qualification Tests: PQT-D6-07, F6-38, F6-39, D-6-01

AWS Letter to S&W dated September 18, 1978

S&W Letters/Memos #SNPS-QC-1184 and QC-1125

This item is considered to be resolved.

(Closed) Unresolved Item (78-01-06): Inconsistencies between procedures governing weld repairs. The inspector examined revisions of the previously examined procedures and ascertained that weld repair criteria have been clarified.

The following documents were reviewed:

Courter NQAM Section SH/12 and Shoreham Addendum dated September 8, 1978

Courter QAP-7.1 dated February 10, 1978

Courter QAP-12.1 dated March 30, 1978

Courter NW-100 dated August 4, 1978

S&W ASME QA&C Exhibit 24 dated September 25, 1978

The inconsistencies appear to be eliminated, and this item is considered to be resolved.

(Closed) Unresolved Item (77-05-01): Seismic Certification of Electrical Penetration. The licensee documentation for the Franklin Institute Research Laboratories final report F-C4033-1 was approved by Stone and Webster Engineering on August 22, 1975 for the use of "Thermofit Type WCSF terminations or splices with N-type adhesive, 0.6-2KV." This item is considered to be resolved.

4. Reactor Building Polar Cranes Inspection

The reactor building polar crane was selected for a visual examination of its structural welds. A review of the FSAR 9.1.4.2.2 and Specification SHI-99 established that the welding was performed in accordance with the AWS D1.1 code.

The visual examination included the accessible parts of the bridge girders, structural trucks, and trolley. A general condition of undercut, in excess of the AWS D1.1 code allowable 1/32", was observed. In addition, isolated cases of underfill and overlap were noted. The inspector requested the licensee to perform a preliminary inspection of the crane welds to determine the extent of the nonconforming conditions. The resultant inspection report, dated October 26, 1978, stated that approximately 30% of the welds have been inspected and that 10% of these have rejectable defects per AWS D1.1 code.

A review of the crane documentation package disclosed that the crane was shop inspected and a statement of conformance issued.

The failure to accomplish welding on the reactor building crane in accordance with the applicable specification and code is an item of noncompliance relative to 10 CFR 50, Appendix B, Criterion IX (322/78-16-01).

5. Calibration and Trip Setting of Switchgear Equipment

During an inspection of the 4160 volt safety related switchgear in the control room building, elevation 25, the inspector noted that construction work was in progress in room 103, but that the energized equipment 1R22*SWG-103 in the room, was not protected as required by procedure CSI-13.1 Housekeeping Shoreham Nuclear Power Station-Unit 1.

The construction activity was generating dirt which was falling on the top surface of the 1R22*SWG-103 switchgear cabinets. The dirt was also filtering thru the top of the cabinets onto the components inside of the cabinets. The inspector did not find any protection over the energized switchgear to prevent construction dirt from falling on and in the cabinets. In reviewing the operating quality control (OQC) inspection sheets for the 1R22*SWG-103 switchgears the inspector could not establish an OQC inspection requirement that required a verification of cleanliness or housekeeping practices for this safety related system. The licensee stated that S&W construction procedure CSI-13.1 and S&W documents referenced govern cleanliness control, even if these are not referenced in OQC procedures.

The failure to maintain and verify equipment cleanliness or housekeeping practices is an item of noncompliance regarding Criterion V of 10 CFR 50, Appendix B. (322/78-16-02)

The licensee took action to clean and cover the switchgear prior to departure of the inspection from the site.

6. Instrumentation Tubing Installation Inspection Instructions

The quality control acceptance criteria for instrumentation tubing installation is listed in Courter Quality Assurance Procedure 6.4 attachment D. titled "Installation Check Points." In discussions with Courter QA personnel, the inspector determined that inspection criteria for such terms as "properly pitched tubing, correct radius, maximum degree of arc" have not been defined. Since final inspection on the instrumentation tubing has not been performed, this matter is considered to be unresolved pending NRC review of the quality control inspection criteria. (322/78-16-03)

7. Quality Assurance Audits - Electrical

The inspector reviewed the latest electrical report of audit performed at the site. It was performed on November 14-18, 1977 and the report titled "Report of the Site Audit #24 for the Shoreham No. 1 Nuclear Power Project." The inspector also reviewed site surveillance report titled "Electrical Installation, FQCSI No. 245 dated June 23, 1978." Both of the above reports addressed the electrical and instrumentation areas.

The audit and surveillance were performed in accordance with written audit procedures, reports were sent to management and reaudits of the electrical area were scheduled in accordance with the audit plan schedule format. The audit surveillance reports listed above identified cleanliness as a site problem in the electrical and instrumentation areas. However, the corrective action taken by the licensee was not adequate to prevent cleanliness deficiencies in the 4160 volt switchger equipment---(see paragraph 5 of this report regarding the item of noncompliance). Except as listed in paragraph 5, no items of noncompliance were identified.

8. Reactor Coolant Pressure Boundary and Safety Related Pipe Welding

The inspector examined the following pipe weld joints and verified that the work, as completed, was in accordance with the Courter Company General Welding Procedures for ASME III Piping, NW-100, the ASME Codes Sections III and IX, and regulatory requirements.

- -- Field weld Ell-IC-1438 FW5, 8" diameter, RHR heat exchanger relief valve discharge pipe, nuclear class II. Verified the fitup and alignment, weld joint preparation and identification, and the quality control inspector preweld inspection.
- -- Ell-ICO19-FW7, 24" diameter, pipe to valve weld joint, nuclear class I. Observed the intermediate weld passes. Verified the weld identification, proper welding procedure, interpass temperature, weld filler metal, and evidence of quality control checks.
- -- IB31-IC175-FW6, 18" diameter, nuclear class I, feedwater piping. Observed the closure of the grind-through repair, R-4. Verified the welders qualification, weld filler material, and quality control documentation.
- -- Ell-IC1438-FW3, 8" diameter, pipe to elbow, RHR heat exchanger relief valve discharge, nuclear class II. Observed the fitup, alignment, tacking, and welding of portions of the root pass. Verified the weld identification, proper weld procedure, the welders gualification, and guality control checks.
- -- 1B21-WFP-8-1-03-FW-F, 12" diameter nuclear class I, feedwater pipe joint. Observed the intermediate welding passes. Verified the weld identification, welder qualification, proper weld procedure, interpass temperature, and quality control checks.
- -- 1B21-WFP-7-1-02-FW-H, 12" diameter, nuclear class I, feedwater pipe joint. Observed the root pass welding. Verified the weld joint identification, welder qualification, proper weld procedure, preheat temperature, and quality control checks.
- -- 1B21-WFP6-1-02-FWG, 12" diameter, nuclear class I, feedwater pipe joint. Observed the fitup and alignment. Verified the joint identification and quality control checks.

9. Emergency Diesel Generator and Auxiliary Equipment

- A. The inspector examined the protection and cleanliness of the diesel engine start system, and the local control panels for the 101, 102, and 103 diesel systems. The equipment was maintained in accordance with the requirements of Shoreham Procedure C.S.I 13.1 titled "Housekeeping, Shoreham Nuclear Power Station-Unit 1 W010-48923" dated July 6, 1978 and ANSI N45.2.3, 1973.
- B. The inspector examined the 103 diesel generator system which included the following selected components.
 - -- 103 Bus 4160 volts
 - -- 103 Associated 4160 volt breakers
 - -- 103 Diesel feed breakers
 - -- 113 480 volt switchgear breaker and bus
 - -- 4160 Motors bus 103-3, 103-4, 103-6, and 103-7

The calibration and trip set points for the system controls were set in accordance with the data established in the Shoreham relay coordination study data report, the equipment was located and separated as required by drawing, identified by quality control, and the work being performed by the personnel was under the latest documentation issue and verified by QC inspectors in their sign-off inspection data sheets.

C. The inspector observed the testing of the 4160 volt switchgear. The set points and equipment calibration was being performed in accordance with procedures and nonconforming items were being identified.

No items of noncompliance were identified.

10. Qualification of Inspection (OA/QC) Personnel

The inspector reviewed at random the qualification records of 4 quality assurance and 6 quality control personnel. The records in the personnel files were up to date, signed and reviewed/approved by their supervisor.

11. Electric Motors and Valve Operators

· · .

- A. The inspector examined the following 4160 volt electric motors and valve operators installed in place and under maintenance control.
 - -- 4160 volt bus position 103-6 RHR
 - -- 4160 volt bus position 103-9 RBSVS and Chiller
 - -- Motor Operated Valves 031A, 031B, and 033B

The above hardware was tagged and stored in-place and complied with the requirements of housekeeping procedure C.S.I. 13.I, dated July 6, 1978.

- B. The inspector observed the completed work associated with the following components.
 - -- 125VDC Distribution Panel 1R42*PNL-B2 and associated breakers
 - -- Battery Charger 1R41-BC-A2-1 (Red)
 - -- 24VDC Distribution Panel 1R41-PNL-A2 busA
 - -- Battery Charger 1R42*BC-A1
 - -- Inverter 1R36-INV-01

The turn-over documentation included the following data records.

- -- Receipt inspection/acceptanc records
- -- Identification Control records
- -- Installation records
- -- Nonconforming records

The cleanliness, calibration and trip set point information was documented in the operation documentation files which were reviewed by the inspector for the above listed items.

12. Electrical Equipment and Components

The inspector reviewed pertinent work and quality records relative to the following equipment and components including terminations and associated hardware. The review was conducted to ascertain whether the records meet established procedures and whether the records reflect work accomplishments consistent with NRC requirements and licensee commitments noted in the SAR Chapter Nos. 1, 3, 6, 7, 8, and 17 (including pertinent codes and standards referenced in these chapters) for the following areas: Receipt inspection and Material Certifications, Storage, Handling and Identification, Installation Inspection, Nonconformance/Deviation Records, Calibration and Trip Setting Data, and the Relay Coordination Study. For this determination the inspector reviewed the following equipment and components.

- -- Battery, racks, and rooms for the A and B system
- -- DC Bus Battery Systems A and B
- -- Breakers for Battery System A and B
- -- Distribution Panel 1R42*PNL-B1-125VDC
- -- Service Water 1P41*P-0038, Core Spray 1E21*P-0138, RHR 1E11*P-0146, and Chiller 1M50*WG-0038
- Electric Valve Operators 1M50*MOV 031B, 032B, 033B, 034B, 031A, 032A, 033A, and 034A.
- -- Unit Substation 1R22*SWG-103-5
- -- Unit Substation 1R23*SWG-101-4
- -- Panel 1R42*NLB101
- -- Motor Control Center 1R24 NCC 1125-01
- -- Cables 1R23BBK117, 1R22NBK347, 1R42BBL102, 1R42BBL122
- -- Battery Charger 1R42*BC-B1
- -- Transformer 1R23*T-103

The records for the above items included the following documentation:

- -- Cable Pull Tickets
- -- Quality Control Inspection Records and Check-off Lists

-- Fir'l Installation Acceptance Electrical Forms

. . .

-- QC Inspection Report (per Specification No. SH1-159 and QCI-FSI-F12, 1-13B and QCI-FSI-F12.1-10D).

In addition to records review, the inspector examined the installation of the above identified items.

The inspector considered the following aspects relative to the above:

-- Installation to latest specification, drawings and changes; verification of required protection after installation, identification and disposition of nonconformance/deviation records, and calibration and trip setting verification data. The trip set points were consistent with engineering issued requirements. The equipment set points were being verified during the testing of the systems.

No item of noncompliance were identified.

13. Circulating Water System Discharge Line isk and Records

The inspector observed activities in-progress, interviewed personnel and reviewed quality related records relative to the circulating water system fibreglass discharge piping installed underwater north from the site. As defined in the Shoreham FSAR Section 3.2.3 the discharge piping is classified as a structure/component whose safety function does not require conformance to 10 CFR 50 Appendix B. However, the licensee has established "Category II" quality assurance measures which include work inspection and control of nonconforming conditions. The discharge system is described in the FSAR Sections 2.4-2.5, and includes diffuser features to minimize environmental impact of facility operation. The inspector examined the controls to ascertain that the FSAR commitments were implemented. This included consideration of questions raised by an employee on October 24, 1978.

The inspector interviewed Stone and Webster (S&W) construction supervisors responsible for the underwater work, Inspectronic Corporation underwater inspection supervisor and a diver/inspector who prepare inspection reports, and a S&W field quality control (FQC) inspector who reviews Inspectronic reports and prepares/ processes nonconformance and disposition (N&D) reports when needed. The inspector examined and compared the files of the inspection reports maintained by Inspectronic and S&W FQC; a sample of twenty indicated that S&W FQC appeared to have copies of each Inspectronic report. The inspector also selected several inspection reports which described problem areas and verified that N&D reports had been prepared, processed, and dispositioned with engineering involvement where necessary. Interview of the Inspectronic diver and supervisor indicated that this group acts as an independent inspection organization; the personnel stated that they feel free to document and discuss with FQC any condition which appears questionable, and they know of no uncorrected condition which would affect the function of the system. The S&W FQC and work supervision similarly identified no outstanding issues.

The inspector specifically inquired into the most recent activities, including replacement of damaged diffuser number 95, and underwater repair of the damaged fibreglass pipe near diffuser 95. The inspector examined the N&D report and related E&DCR-F-5251 and observed a replacement diffuser on a barge, ready for transport and installation. The inspector also examined in-progress N&D-1902 (dated October 18, 1978) and related Inspectronics reports regarding the fibreglass pipe damage and the preparations for its reapir. Personnel interviews indicate that S&W engineering personnel are involved in assessing and dispositioning the repair.

The disposition of inspection reports and the fibreglass repairs were questions raised by the employee October 24, 1978. In subsequent discussion with the employee on October 31, 1978, he stated that his questions were satisfactorily answered. The employee identified no safety concern nor condition which would compromise the function of the system. The NRC inspector identified no such items, nor any FSAR deviations.

The inspector examined the following documents relative to the above:

Inspectronic 1978 File of Inspection Reports

S&W FQC 1976-1978 File of Inspection Reports

S&W FQC File of N&D Reports For Specification #138

Specific Inspectronic Inspection Reports Dated:

1977: September 30, October 5 1978: May 8, May 26, June 1, June 5, September 20, October 13, October 16, and October 23

Specific S&W FQC N&D Reports:

#1472, 1500, 1573, 1665, 1902 Design Change Report E&DCR-F-5251 Drawing FY-5A-5 Specification SH1-138 w/Addendum 1 and E&DCR's

14. Recirculating Water System Intake Canal Work & Records

The inspector observed the status of the intake canal construction and the shoreline area 200 feet east of the canal, and examined drawings and records and interviewed construction supervision regarding the canal. As defined in the Shoreham FSAR Section 3.2.2 the intake canal is classified as a structure whose safety function does not require conformance to 10 CFR 50 Appendix B. Since the FSAR Sections 2.4 and 2.5 describe safety related considerations relative to channel size and slope stability, the inspector examined site construction drawings and records for consistency with the FSAR requirements. He also considered questions raised by an employee on October 24, 1978

The inspector ascertained that the cross section drawings were consistent with FSAR figure 2.4.8-2 and 2.4.8-3A with regard to slopes, elevations, canal width/depth, and stabilization. He examined S&W survey notes of canal soundings, and inspection reports of Inspectronic Corporation. He viewed the canal and jetty construction and observed presence of filter material and stabilizing rock and slrped profiles. The canal and jetty work is essentially complete except for final dredging.

The inspector interviewed construction and inspection personnel regarding canal profiles and filter cloth placement, and examined related inspection reports, including Inspectronic Corporation report dated August 14, 1978 regarding bulges/bumps over which filter cloth had been placed. It was determined that the bumps (depressions due to clam shell excavation), which were the subject of the employee questions, would not affect the integrity or function of the canal. The employee stated on October 31, 1978, that his questions were resolved.

The inspector examined the following documents relative to the above:

Drawing FY-2B-11, M-13139-2; YF SK-21R-1 E&DCR's: F1653, F2612, F4546A, F11018, F12989, F13069, F14499, F15183 Inspectronic Corp. Diver Inspection Report File of 1978

The inspector identified no items of noncompliance or deviation.

15. Licensee Action on NRC Issued Bulletins & Circulars

The inspector reviewed site records relating to the following Circulars and Bulletins. The inspector verified that the documents were routed for information, assigned for action to appropriate management as provided by project procedure 202A, and appropriate actions taken, or the documents were entered into the project manager's "Required Action Summary for week ending November 3, 1978" to assure future action. The following status was determined regarding the above:

Circular	Routed	Assigned	"Action Summary"
77-11	Yes	Yes	Action Complete
77-14	Yes	No	Yes
77-15	Yes	No	Yes
77-16		No	Yes
78-02	Yes	No	No
78-03	Yes	No	Yes
78-04	Yes	Yes	Action Complete
78-06	Yes	No	Yes
78-07	Yes	Yes	Action Complete
78-08	Yes	No	Yes
78-09	Yes	No	Yes
78-11	Yes	No	Yes
78-12	Yes	No	No
78-13	Yes	No	Yes
78-14	Yes	No	Yes
78-15	Yes	No	Yes
78-16	Yes	No	No
78-17	Yes	No	No

Circular 78-04 is not applicable since a different type fire door is used from that described in the Circular. Circular 78-07 is not applicable, (nor is Bulletin 78-10) since no hydraulic snubbers are used at Shoreham. For Circular 77-11, a determination was made that Propylene Tripolymer (EPT) seats of the Shoreham main ventilation system Fisher control valves is similar to the material described in the Circular. Tentative plans are described to monitor leakage behavior during function tests.

The inspector concluded that a control system had been established and is being implemented to assure that NRC issued Bulletins and Circulars are evaluated by appropriate personnel for applicability. Since many of these evaluations have not yet been made (for Circulars issued up to a year ago). the inspector indicated that he would perform further review of this area during subsequent inspections.

The inspector did not identify any items of noncompliance.

Licensee Followup Activities Relative to Items Reported to NRC Under 10 CFR 50.55(e)

The inspector reviewed the licensee's letter to NRC dated October 10, 1978, regarding cable tray and conduct support fittings certifications. The engineering evaluation appeared to be appropriate and the questions related only to the aforementioned fittings. The inspector had no further questions regarding this matter.

17. Water Dye Discharge

The inspector observed a green color of the water in the intake canal at the screen wall and at a storm drain discharge in the canal. He requested identification of the substance and examination of the discharge permit provision allowing such discharge. The licensee identified the material as a fluorescein dye, and identified the individual within the NYS Department of Environmental Conservation with whom approvals had been coordinated. IE environmental inspectors subsequently contacted the DEC and verified their cognizance of the discharge and its acceptability.

No items of noncompliance were identified.

18. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item disclosed during the inspection is discussed in Paragraph 6.

19. Management Interview

At the conclusion of the inspection on October 27, 1978, a meeting was held at the Shoreham site with representatives of the licensee and contractor organizations. Attendees at this meeting included personnel whose names are indicated by notation (*) in paragraph 1. The inspectors summarized the results of the inspection as described in this report.