Nebraska Public Power District

GENERAL OFFICE
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January 9, 1979

Director, Nuclear Reactor Regulation
Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 3
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Section 8.0 to Amendment 39
Quality Assurance Program
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Reference: Letter, J. M. Pilant to Thomas A. Ippolito
Dated November 9, 1978
Additional Information - Quality Assurance Program

Dear Mr. Ippolito:

We indicated, in the referenced letter, that Appendix A to Amendment 39 would be submitted by January 15, 1979 which would identify the exceptions we are proposing to take relative to the "Orange Book". We have elected to provide this information as an additional section (8.0) of Amendment 39 rather than an appendix.

Inasmuch as review and approval of these proposed exceptions may take several months, we would like to reiterate our previous request that the revised Quality Assurance Program be approved with the exception of the proposed Section 8.0. As stated previously, the District will comply with the requirements of the "Orange Book" until such time all exceptions are satisfactorily resolved and approved by the Commission.

Should you have any questions or require additional information regarding Section 8.0 to Amendment 39, please do not hesitate to contact me.

In addition to one signed original, 39 copies of this information are also submitted.

Sincerely,

Jay M. Pilant

Jay M. Pilant
Director of Licensing and
Quality Assurance

/cmk
Enclosure

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NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

QUALITY ASSURANCE PROGRAM FOR OPERATION

POLICY DOCUMENT

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STATE OF NEBRASKA)
) ss
PLATTE COUNTY)

Jay M. Pilant, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements in said application are true to the best of his knowledge and belief.

Jay M. Pilant

Subscribed in my presence and sworn to before me this 9th day of January, 1979.

Marilyn R. Hohndorf
NOTARY PUBLIC

My Commission expires Oct. 14, 1980.

GENERAL NOTARY - State of Nebraska
MARILYN R. HOHNDORF
My Comm. Exp. Oct. 14, 1980

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Assignment of QC inspectors is a function of station management. The majority of the QA/QC inspections are assigned to engineers, licensed reactor operators or lead technicians. This method for selecting and assigning inspectors has assured station management that the best qualified individual (either throgh education or years of experience) is assigned to monitor "essential" or safety-related activities.

The method endorsed by ANSI N45.2.6 places emphasis on certifying individuals and establishing levels of qualification. It is our contention that even though an individual is certified and qualified to the apprpriate level, he may not be the best inspector in all situations.

The current method of selecting and assigning QC inspectors at CNS has proven to be very effective. We therefore take exception to sections 2.0 and 3.0 of ANSI N45.2.6. If future operation indicates that our present system is inadequate, efforts will be made to establish the system endorsed by ANSI N45.2.6.

CNS does not have the in-house capability to perform nondestructive examinations in accordance with SNT-TC-1A. These services are currently contracted to an approved vendor.

(c) Implementation

The guidance set forth by ANSI N45.2.6 will not be implemented at Cooper Nuclear Station until the present system of selecting and assigning qualified inspection and testing personnel is found to be inadequate.

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8.0 Implementation, WASH-1283, -1284 and -1309

Except as modified in the sections which follow, it is intended that the CNS QA Program for Plant Operations will utilize the guidance provided by NRC publications WASH-1283 (5-24-74), WASH-1284 (10-26-73) and WASH-1309 (5-10-74) ("rainbow" series) to the extent that these documents provide practical guidelines for safety-related activities occurring during the operational phase of plant life.

The existing operational QA Program does not address all of the detailed requirements set forth in the "rainbow books". A detailed review has been made to determine where the CNS QA Program differs from the ANSI Standards cited in the "rainbow books".

With respect to the applicability of the "rainbow books" and the associated standards, it is impracticable to apply all of the requirements set forth by these documents to a plant for which important, and (in some respects) irreversible commitments were made 8 to 10 years ago. It is also impracticable to apply requirements to an operating plant which were intended solely for the design and construction phase.

The following sections summarize the scope and applicability of ANSI Standards and describe specific exceptions that will be taken in applying the guidance of these documents to the CNS QA Program.

8.1 ANSI N45.2-1971 Quality Assurance Program Requirements for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.28 shall be applied to the Operational QA Program to those activities affecting the safety-related aspects of the operational phase of CNS.

Where codes or standards are referenced, or are incorporated into the standard by reference, which are in conflict with original design commitments as set forth in the SAR, the SAR commitments shall govern. Later revisions of applicable codes and standards may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal to or better than" original condition.

(b) Specific Exceptions

Quality Assurance Program (Section 2)

The QA Program describes the measures utilized to comply with the requirements of 10CFR50 Appendix B to the extent that ANSI N45.2 parallels that NRC regulations, the CNS QA Program conforms to this ANSI Standard. Where other particular ANSI Standards apply, they are referenced in the QA Program and implementing procedures.

Inspection (Section 11)

First Level inspection has been assigned to plant personnel. Contrary to the requirement of this standard that such persons shall not report directly to the same immediate supervisor, our program requires only that inspection activities to verify quality of work shall be performed by persons other than those who performed the activity being inspected.

(c) Implementation

Existing program requirements do not necessarily address all of detailed guidance set forth by ANSI N45.2. However, the CNS QA Program does establish the levels of control required by ANSI N45.2.

8.2 ANSI N45.2.1-1973 Cleaning of Fluid Systems and Associated Components During the Construction Phase of Nuclear Power Plants

(a) Scope and General Applicablity

Insofar as the requirements of N45.2.1 are directed primarily at contractor activity during construction, this standard cannot be directly applied to operational requirements.

The guidance provided by this standard and the associated Regulatory Guide 1.37 shall be applied to safety-related maintenance, repair, and modification activities occurring during the operational phase of Cooper Nuclear Station to the extent that such activities are comparable in nature and degree to similar activities occurring during the design and construction phase.

(b) Specific Exceptions

General Requirements (Section 2)

Cleaning requirements for almost all maintenance, repair and modification work will be considered as a part of the overall job requirements. In this respect, detailed cleaning procedures will not generally be prepared as separate documents. Necessary requirements, consistent with the scope of the work, will be included as a part of the overall work instructions.

Criteria for Cleaning (Section 3)

For cleanness classifications where the scope of plant modification work is such as to make application of the guidance provided by this standard practicable, the cleanness classifications and requirements thereof shall be evaluated and applied, as appropriate, as a part of the overall work requirements. For most modification or maintenance work, however, involving only small portions or individual compenents of larger systems, it is not considered practicable to conduct ASTM E11-70 cleanness tests. Appropriate cleanness will be maintained during the work and appropriate preoperational flushing will be conducted, consistent with the scope of the work performed and the original design requirements.

8.3 ANSI N45.2.2-1972 Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)

(a) Scope and Applicability

The guidance provided by this standard shall be evaluated and applied to those packaging, shipping, receiving, storage and handling activities associated with safety-related items, to the extent that such activities are comparable in nature and degree to similar activities occurring during the construction phase.

(b) Specific Requirements

Our program is structured to identify safety-related equipment and provide for designation of packaging, shipping, receiving, storage and handling requirements for purchased parts and materials. The classifications of this standard cannot be applied directly to individual spare parts or subassemblies of the parent equipment. Due to difference in volume, complexity, inspectability, etc., the packaging, shipping, handling and storage requirements of spare parts and subassemblies will necessarily be different from the requirements which may be imposed on the entire component or piece of parent equipment.

The majority of items purchased for an operating plant consist of components, subassemblies and individual spare parts which could be used in a multitude of different applications. Such items are purchased to the highest requirement of intended use. The volume and characteristics of purchases during the operational phase differ significantly

from those purchases made during the design and construction phase, and storage facilities are considerably different. Items that require special measures of storage protection will be identified as a part of the purchasing documents. Items that must be stored outdoors (equivalent of Level D) or items that must be stored in covered but unheated conditions (equivalent of Level C) will be evaluated on an individual case basis. However, it is not considered practicable to preclassify individual parts by levels are required by Section 2.7 of this standard. Shipping and packaging requirements for such items will likewise be handled in the purchase order documents, as appropriate.

(c) Implementation

Adequate control is being maintained by standard warehouse practices and by specific review of all purchase orders for safety-related items per the existing plant procedures.

8.4 ANSI N45.2.3-1973 Housekeeping During the Construction Phase of Nuclear Power Plants

(a) Scope and General Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.39 for control of housekeeping requirements shall be applied to work conditions and other applicable activities which could affect quality of important operational aspects of CNS to the extent that such activities are comparable in nature and degree to similar activities occurring during the design and construction phase.

(b) Specific Exceptions

General Requirements (Section 2)

The plant has been divided in zones for fire protection and security purposes. The zone designated for cleanness in the ANSI Standard are primarily intended for control of work during construction of the plant. Therefore, the CNS facilities will not be classifed by the zones designated in the Standard general housekeeping rules. Limitations on eating, drinking, and smoking are already provided in existing CNS procedures. Where special cleanness controls and tool and material accountability are required for particular types of work, temporary clean areas will be designated and defined in the procedures for accomplishing the work.

Requirements (Section 3)

Fire protection and prevention equipment will be provided as set forth in accordance with NPPD evaluation of the CNS fire protection system as submitted to the NRC on 10/17/76 and 4/6/77.

(c) Implementation

Existing maintenance procedures will be reviewed to determine the need for particular cleanness, housekeeping and control provisions. Where indicated, procedures will be revised to incorporate such provisions.

8.5 ANSI N45.2.4-1972 Installation, Inspection and Testing Requirements for Instrumentation and Electric Equipment During the Construction Phase of Nuclear Power Generating Stations

(a) Scope and Applicability

This standard was written to apply to construction of nuclear plants and the requirements set forth are based on the construction situation. As such, implementation of all the requirements of this standard for operating plants, considering the scale of plant modification versus initial construction, is not practicable.

The guidance provided by this standard and the associated Regulatory Guide 1.30 shall be applied to installation, inspection and testing of electrical equipment and systems associated with on-site safety-related modification work occurring during the operational phase of CNS to the extent that such work is comparable in nature and extent to similar work occurring during the design and construction phase.

Where specific design requirements included in this standard or referenced codes and standards are in conflict with original design requirements set forth in the SAR and other appropriate design documents, the original design requirements shall govern.

(b) Specific Exceptions

Definititions (Section 1.4)

The definition of Class I and Class IE electrical equipment set forth by this standard does not conform to the equipment categories of CNS. Essential electrical items upon which the Operational QA Program is based are included in the SAR Amendment 39. The scope and applicability of this standard shall necessarily be limited to these defined areas.

Procedures and Instructions (Section 2.3)

Appropriate requirements for installation, inspection and tests will be set forth by job specifications and work instructions developed as a part of the modification work package. It is not intended that separate procedures be established which specifically address the various areas of this standard. However, in the development of the work package, consideration will be given to the areas outlined in Section 2.3, as appropriate.

Installation, Verification and Test (Section 4.0, 5.0 and 6.0)

The requirements of the installation and the associated inspections, verifications and tests are included in the work instructions as appropriate, consistent with the scope of the work and the imporatance of quality. In the develop-

ment of the work instructions, consideration will be given to the guidance provided by Sections 4.0, 5.0 and 6.0 of this standard, and appropriate requirements will be incorporated into the instructions. It is not intended that separate procedures be established which specifically address all of the areas referenced.

Applicable Codes, Standards and Guides (Section 9.0 and Appendix B)

Application of the guidance provided by the additional codes and standards listed in Appendix B will be considered to the extent that such codes and standards provide useful and practical guidance for the work being performed. Commitment to the guidance of N45.2.4 shall not include commitment to the guidance of referenced standards. (See Regulatory Guide 1.30, Safety Guide 30)

(c) Implementation

It is not intended that the QA program requirements address all of the detailed guidance set forth by ANSI N45.2.4. Appropriate controls have been implemented to control modification work and testing to assure that such work meets or exceeds original design requirements. Existing procedures include appropriate requirements for installation, inspection and testing.

8.6 ANSI N45.2.5-1974 Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

(a) Scope and Applicabiltiy

This standard was written for use during construction of nuclear plants and the requirements set forth are based on construction situation. As such, implementation of all the requirements of this standard for operating plants, considering the scale of plant modification versus initial construction, is not practicable.

The guidance provided by this standard and the associated Regulatory Guide 1.97 shall be applied to activities involving safety-related concrete and structural steel work occurring during the operational phase of Cooper Nuclear Station to the extent that such activities are comparable in nature and degree to similar activities occurring during the design and construction phase.

Where specific design requirements included in this standard or referenced codes and standards are in conflict with original design requirements set forth in the SAR and other appropriate design documents, the original design requirements shall govern.

(b) Specific Exceptions

Procedures and Instructions (Section 2.2)

Appropriate requirements for installation, inspection and tests will be set forth by job specifications and work instructions developed as a part of the modification work package. It is not intended that separate procedures be established which specifically address the various areas of this standard. However, in the development of the work package, consideration will be given to the areas outlined in Section 2.2, as appropriate.

Personnel Qualifications (Section 2.4)

The existing Operational QA Program does not include provisions for certification of personnel per N45.2.6. (Please refer to Section 7.7 of this document.)

Calibration and Control (Section 2.5.2)

The requirements of control and calibration of measuring and test equipment set forth by this standard shall be applied to all measuring and test equipment used by NPPD or their agents, test laboratories and contractors. Such requirements, however, will not be imposed on commercial batch plant facilities. Instrumenatation at commercial batch plant facilities will be evaluated to determine that sufficient accuracy can be obtained.

Qualification Tests (Section 3.2.1)

For small quantities of concrete involved in modification work, all concrete must be purchased from commercial concrete batch plants. For small quantities of concrete, it is unreasonable to expect commercial facilities to shut down normal operations to provide certified aggregate, cement, admixtures, fly ash, water, etc. In this respect, the qualification tests required by Table A for aggregate; cement; admixtures; fly ash and pozzolans; water and ice will not be required. Appropriate evaluations will be made to determine that good quality and generally acceptable materials are used. This evaluation, coupled with slump tests, air entrainment tests and concrete cylinder strengths, will provide adequate control and qualification of the concrete.

Design mixes consistent with, or equivalent to, original requirements will be specified and the results of the cylinder tests will be evaluated based on the acceptance criteria associated with the original design mix requirements.

Protection of Materials (Section 4.2)

The inspection requirements of Section 4.2 will not generally be performed, as the small quantities of concrete involved in modification work will no doubt be mixed using materials already in the batch plant bins. Control of storage of materials would not be practicable.

Measuring, Mixing and Transporting (Section 4.3)

If available, appropriate certifications shall be obtained from the concrete supplier which verify the adequacy of truck mixers per the requirements of ACI-304, ASTM C-94. Where certifications are not available, two concrete test cylinders representing the first and last one-third of truck mixer contents shall be taken for evaluation of the mixer truck, over and above the normal concrete cylinders taken to evaluate the in-place concrete. The concrete batch plant facility shall be inspected to assure that reasonable controls are being exercised with reference to the inspection guidelines set forth by Section 4.3(1) and (2).

Preplacement Preparation (Section 4.4)

Inspection of soils and earthwork will meet the general requirements set forth. The extent to which individual inspection requirements are met will depend upon the nature and scope of the work to be performed.

In-Process Tests on Concrete and Reinforcing Steel (Section 4.8)

Except for normal batch qualification tests (slump, air content, temperature and compressive strength) and initial reinforcing steel certifications, the in-process tests required by Table B are generally applicable to the periodic control which must be exercised with reference to long-term

consturction type programs. The in-process test requirements of Table B are not considered applicable to short-term modification work as would be required by QA at CNS.

(c) Implementation

Existing program requirements do not address the guidance set forth by ANSI N45.2.5. Where the need arises, measures will be implemented to meet the intent of this standard with the exceptions noted above.

8.7 ANSI N45.2.6-1973 Qualification of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.58 shall be applied to inspection, examination and testing activities associated with safety-related modification work accomplished during the operational phase at CNS.

(b) Specific Exceptions

It has always been the belief of CNS and NPPD that, in order to be effective, quality control must be built into the operation of the plant. With this in mind, CNS incorporated quality control inspection and test functions directly into the station operating procedures. Inspection points are then witnessed and signed-off by members of the operating staff not directly involved in the activity being inspected.

8.8 ANSI N45.2.8 - Draft 3, Rev. 3 Apr. 1974 Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants

(a) Scope and Applicability

This standard was written to apply to construction of nuclear plants and, as such, the requirements set forth and the feasibility, both from an economical viewpoint and a practical viewpoint, are based on the construction situation. As such, implementation of all the requirements of this standard for operating plants, considering the scale of plant modification versus initial construction, is not practicable.

The guidance provided by this standard shall be applied to installation, inspection and testing of electrical equipment and systems associated with on-site safety-related modification work occurring during the operational phase of CNS to the extent that such work is comparable in nature and extent to similar work occurring during the design and construction phase.

Where specific design requirements included in this standard or referenced codes and standards are in conflict with original design requirements set forth in the SAR and other appropriate design documents, the original design requirements shall govern.

(b) Implementation

It is not intended that the QA program requirements address all of the detailed guidance set forth by ANSI N45.2.8. Appropriate controls have been implemented to control modification work and testing to assure that such work meets or exceeds original design requirements. Existing procedures include appropriate requirements for installation, inspection, and testing.

8.9 ANSI N45.2.9-1974 Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants

(a) Scope and Applicability

Consistent with the implementation date set forth below, the guidance provided by this standard and the associated Regulatory Guide 1.88 shall be applied to quality assurance records associated with the operational phase of CNS.

For those design, manufacturing, construction and operating records generated prior to implementation of this standard, it is not our intent to backfit the detailed requirements of this standard to those records. All such records, however, have been initially designated for lifetime storage, until specific review dictates otherwise, and will be stored in the permanent record storage facility. Appropriate record indexes and filing system shall be established to permit reasonable identification and retrieval. The records will be stored and preserved per the requirements of Section 5.0 of this standard.

(b) Implementation

NPPD has established a document storage and retrieval system consistent with the guidelines of ANSI N45.2.9. All quality-related documents will be reviewed, dispositioned, coded, microfilmed (if practical) and stored in accordance with a pre-determined retention time. Procedures to implement this sytem will be continually upgraded to reflect the current operation.

8.10 ANSI N45.2.10-1975 Quality Assurance Terms and Definitions

(a) Scope and Applicability

The quality assurance terms and definitions contained in this standard shall be used as guidance and applied as appropriate to the Operational QA Program for Cooper Nuclear Station.

(b) Implementation

The use of this standard and the associated Regulatory Guide 1.74 shall be effective immediately. There may be instances where existing procedures contain definitions that may not be in strict accordance with those provided by this standard. As existing procedures are revised, however, such definitions shall be evaluated to determine if the intent of all definitions meets the intent of those provided by this standard.

8.11 ANSI N45.2.11-1974 Quality Assurance Requirements for Design of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.64 shall be applied to design activities involving safety-related modification work and the revision or development of plant design documents occurring during the operational phase of Cooper Nuclear Station.

Where codes, standards or design requirements are referenced, or are incorporated into the standard by reference, which are in conflict with original design commitments as set forth in the SAR, the SAR commitments shall govern. Later revisions of applicable codes and standards may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal to or better than" original condition.

(b) Implementation

The quality assurance requirements for the design of Cooper Nuclear Station are addressed in the FSAR (Amendment 39) and in the QA Program implementing procedure (QAP-1700).

The quality assurance program for monitoring design control at CNS and at the corporate level follows the guidelines set forth in ANSI N45.2.11. It is not intended that the QA Program address all of the detailed guidance set forth by this standard, however, the guidance provided is presently being used.

8.12 ANSI N45.2.12-1974 Requirements for Auditing of Quality Assurance Programs for Nuclear Plants

(a) Scope and Applicability

Except as expressly modified below, the guidance provided by this standard shall be applied to the audit program identified by the Operational QA Program for Cooper Nuclear Station.

(b) Specific Exceptions

Audit Schedule (Section 3.4.2)

Due to the large scope of our QA Program and the audit areas defined, it is not practicable to audit and entire program on an annual basis. Our scheduling provides for applicable elements of the QA Program to be audited at least once every two (2) years.

The audited organization is required by existing procedures to respond in writing to deficiencies noted in the audit report. A minimum response time is not specified because corrective action varies depending on the nature and extent of the deficiency. However, corrective action is subject to follow-up audits and reports to higher management within eight (8) weeks of issuance of the original audit report.

(c) Implementation

The guidance provided by this standard is presently being used as a part of the Operational QA Program for Cooper Nuclear Station.

8.13 ANSI N45.2.13 Draft 2 Rev. 4 Apr. 1974 Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

(a) Scope and Applicability

To the extent that the information set forth by this standard provides useful and practical guidelines for purchasing activities associated with nuclear safety-related equipment, components, parts, materials and services, the guidance provided will be applied to such activities associated with the CNS Operational QA Program.

It must be recognized, however, that equipment and components purchased during the design and construction phase were not purchased on the basis of present-day standards, especially with reference to vendor qualification and vendor quality assurance programs. In this respect, replacement parts and spare parts for existing equipment are often limited to sole-source suppliers, some of whom may not meet present-day qualification standards. Such replacement parts or spare parts are purchased to appropriate quality standards to maintain an equal to, or better than, condition but it is not considered practicable to backfit the requirements of the standards to all such vendors.

(b) Specific Exceptions

Selection Measures (Section 4.2)

In addition to the methods outlined by subparagraphs 4.2.a., 4.2.b and 4.2.c, consideration will be given to products in which quality can be verified by receiving inspection, test or other means. Evaluation of procurement sources for such items may be made on the basis of subparagraph 4.2.a, but on a much less restrictive basis.

Sole-source replacement part or spare part suppliers may have to be evaluated based on product performance and maintenance of an equal to, or better than, condition.

Conformance to Procurement Documents (Section 5.2)

Measures shall be established to assure the successful bid conforms to procurement document requirements. There will be no requirement, however, to document the bid evaluations.

Preaward Evaluation (Section 5.3)

The requirement and extent to which preaward evaluations are performed will be subject to the conditions of Section 6.2 of the standard.

Certificate of Conformance (Section 10.2)

The minimum criteria set forth are much too restrictive for general application of certification of conformance involving off-the-shelf items and many applications involving the purchase of simple spare parts. The requirements set forth by this section will be considered in purchasing activities to the extent that the guidance provided is useful and can be practicably applied to our purchasing activities.

(c) Implementation

Existing program requirements conform to the guidance set forth by ANSI N45.2.13.

8.14 ANSI-N18.1-1971

The CNS Technical Specifications (Section 6.1.4) require that plant personnel meet the requirements of ANSI N18.1-1971.

CNS Administrative Procedure No. 1.5 specifies the requirements for the training program for plant personnel. This procedure meet the requirements of ANSI N18.1-1971 and 10CFR55 (including Apperdix A).

8.15 ANSI-N18.7 - 1972

The operational QA Program for CNS is considered to conform to the guidance provided by this standard. For certain minor details regarding content and format, CNS procedures accomplish this intent by means other than specified in the ANSI standards. For example, in lieu of a matrix which indexes documents to the requirements of N18.7, the QA Policy Document identifies operating and QA procedures and cross-references them to the requirements of 10CFR50 Appendix B. This accomplishes the intent of Paragraph 5.1 and it is not considered necessary to duplicate this index in a different form.