

Enclosure 3

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specification
Semiannual Radioactive Effluent Release Report

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* Supersedes proposed changed technical specification page submitted by Georgia Power Company letter dated September 21, 1992.

** New proposed changed technical specification page.

Unit 1

1.0 DEFINITIONS

UU. SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

VV. PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM (PCP) shall be implemented by procedures which contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

WW. SOLIDIFICATION

This definition transferred to the PCP per NRC Generic Letter 89-01.

XX. OFFSITE DOSE CALCULATION MANUAL

The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the radioactive effluent controls required by Technical Specification 6.18 and Radiological Environmental Monitoring Program required by Technical Specification 6.19 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Surveillance Report required by Technical Specification 6.9.1.6 and the Annual Radioactive Effluent Release Report required by Technical Specification 6.9.1.8.

YY. GASEOUS RADWASTE TREATMENT SYSTEM

This definition transferred to the ODCM per NRC Generic Letter 89-01.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.15.1.4^(*) The contents within any outside temporary tank shall be limited to ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY

At all times. This specification does not apply to disposable liners used for shipment of radioactive waste.

ACTION

- a. With the contents within any outside temporary tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents within the limit and provide notification to the Commission pursuant to Specification 6.9.1.8.

SURVEILLANCE REQUIREMENTS

4.15.1.4 The quantity of radioactive material contained in any outside temporary tank shall be determined to be within the above limit by analyzing a sample of each batch of radioactive material prior to its addition to the tank.

a. An outside temporary tank is not surrounded by liners, dikes, or walls that are capable of holding the tank contents and not having tank overflows and drains connected to the liquid radwaste treatment system.

RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.15.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be limited to ≤ 4 percent by volume.

APPLICABILITY

At all times.

ACTION

- a. With the concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system exceeding the limit, restore the concentration within the limit within 48 hours.
- b. When the ACTION statement or other requirements of this LCO cannot be met, steps need not be taken to change the Operational Mode of the Unit. Entry into an Operational Mode or other specified condition may be made if, as a minimum, the requirements of the ACTION statement are satisfied.

SURVEILLANCE REQUIREMENTS

4.15.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be determined to be within the above limits by monitoring the waste gases in the main condenser offgas treatment system with the (hydrogen) monitors required OPERABLE by table 3.14.2-1, Specification 3.14.2.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^(*)

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

a. A single submittal may be made for a multiple-unit station. The submittal should combine those sections that are common to all units at the station; however, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

6.16 POST-ACCIDENT SAMPLING AND ANALYSIS

A program shall be established, implemented, and maintained to ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions.

The program shall include the following:

- (1) Training of personnel,
- (2) Procedures for sampling and analysis, and
- (3) Provisions for maintenance of sampling and analysis equipment.

6.17 OFFSITE DOSE CALCULATION MANUAL

6.17.1 Licensee-initiated changes to the ODCM shall:

- a. Be documented and records of reviews performed shall be retained as required by Technical Specification 6.10.2.o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Become effective after review and acceptance by the PRB and the approval of the General Manager-Nuclear Plant.
- c. Be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.18 RADIOACTIVE EFFLUENTS CONTROL PROGRAM

A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the OPERABILITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,

Unit 2

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1.0 DEFINITIONS (Continued)

SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM (PCP) shall be implemented by procedures which contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

SOLIDIFICATION

This definition transferred to the PCP per NRC Generic Letter 89-01.

OFFSITE DOSE CALCULATION MANUAL

The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the radioactive effluent controls required by Technical Specification 6.18 and Radiological Environmental Monitoring Program required by Technical Specification 6.19 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Surveillance Report required by Technical Specification 6.9.1.6 and the Annual Radioactive Effluent Release Report required by Technical Specification 6.9.1.8.

GASEOUS RADWASTE TREATMENT SYSTEM

This definition transferred to the ODCM per NRC Generic Letter 89-01.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4^(a) The contents within any outside temporary tank shall be limited to ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY

At all times. This specification does not apply to disposable liners used for shipment of radioactive waste.

ACTION

- a. With the contents within any outside temporary tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents within the limit and provide notification to the Commission pursuant to Specification 6.9.1.8.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in any outside temporary tank shall be determined to be within the above limit by analyzing a sample of each batch of radioactive material prior to its addition to the tank.

a. An outside temporary tank is not surrounded by liners, dikes, or walls that are capable of holding the tank contents and not having tank overflows and drains connected to the liquid radwaste treatment system.

RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be limited to ≤ 4 percent by volume.

APPLICABILITY

At all times.

ACTION

- a. With the concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system exceeding the limit, restore the concentration within the limit within 48 hours.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be determined to be within the above limits by monitoring the waste gases in the main condenser offgas treatment system with the (hydrogen) monitors required OPERABLE by table 3.3.6.10-1, Specification 3.3.6.10.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^(*)

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

a. A single submittal may be made for a multiple-unit station. The submittal should combine those sections that are common to all units at the station; however, the submittal shall specify the releases of radioactive material from each unit.

6.16 POST-ACCIDENT SAMPLING AND ANALYSIS

A program shall be established, implemented, and maintained to ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions.

The program shall include the following:

- (1) Training of personnel,
- (2) Procedures for sampling and analysis, and
- (3) Provisions for maintenance of sampling and analysis equipment.

6.17 OFFSITE DOSE CALCULATION MANUAL

6.17.1 Licensee-initiated changes to the ODCM shall:

- a. Be documented and records of reviews performed shall be retained as required by Technical Specification 6.10.2.o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Become effective after review and acceptance by the PRB and the approval of the General Manager-Nuclear Plant.
- c. Be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.18 RADIOACTIVE EFFLUENTS CONTROL PROGRAM

A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the OPERABILITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

Enclosure 4

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications
Semiannual Radioactive Effluent Release Report

Hand-Marked Pages

Unit 1

1.0 DEFINITIONS

UU. SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

VV. PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM (PCP) shall be implemented by procedures which contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

WW. SOLIDIFICATION

This definition transferred to the PCP per NRC Generic Letter 89-01.

XX. OFFSITE DOSE CALCULATION MANUAL

The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the radioactive effluent controls required by Technical Specification 6.18 and Radiological Environmental Monitoring Program required by Technical Specification 6.19 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Surveillance Report required by Technical Specification 6.9.1.5 and the ~~Semiannual~~ Radioactive Effluent Release Report required by Technical Specification 6.9.1.8.

Annual

YY. GASEOUS RADWASTE TREATMENT SYSTEM

This definition transferred to the ODCM per NRC Generic Letter 89-01.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.15.1.4^a The contents within any outside temporary tank shall be limited to ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY

At all times. This specification does not apply to disposable liners used for shipment of radioactive waste.

ACTION

- a. With the contents within any outside temporary tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents within the limit and provide notification to the Commission pursuant to Specification 6.9.1.8.

~~b. The provisions of Specification 6.9.1.13(b) are not applicable.~~

SURVEILLANCE REQUIREMENTS

4.15.1.4 The quantity of radioactive material contained in any outside temporary tank shall be determined to be within the above limit by analyzing a sample of each batch of radioactive material prior to its addition to the tank.

- a. An outside temporary tank is not surrounded by liners, dikes, or walls that are capable of holding the tank contents and not having tank overflows and drains connected to the liquid radwaste treatment system.

RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.15.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be limited to ≤ 4 percent by volume.

APPLICABILITY

At all times.

ACTION

- a. With the concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system exceeding the limit, restore the concentration within the limit within 48 hours.

~~b. The provisions of Specification 6.9.1.13(b) are not applicable.~~

b/c. When the ACTION statement or other requirements of this LCO cannot be met, steps need not be taken to change the Operational Mode of the Unit. Entry into an Operational Mode or other specified condition may be made if, as a minimum, the requirements of the ACTION statement are satisfied.

SURVEILLANCE REQUIREMENTS

4.15.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be determined to be within the above limits by monitoring the waste gases in the main condenser offgas treatment system with the (hydrogen) monitors required OPERABLE by 3.14.2-1, Specification 3.14.2.

ADMINISTRATIVE CONTROLS

Annual
ANNUAL
~~SEMIANNUAL~~ RADIOACTIVE EFFLUENT RELEASE REPORT^(*) calendar year

6.9.1.8 The ~~Semiannual~~ Radioactive Effluent Release Report covering the operation of the unit during the previous ~~6 months of operation~~ shall be submitted ~~within 60 days after January 1 and July 1~~ of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

before May 1

4. A single submittal may be made for a multiple-unit station. The submittal should combine those sections that are common to all units at the station; however, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

6.16 POST-ACCIDENT SAMPLING AND ANALYSIS

A program shall be established, implemented, and maintained to ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions.

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6.17 OFFSITE DOSE CALCULATION MANUAL

6.17.1 Licensee-initiated changes to the ODCM shall:

a. Be documented and records of reviews performed shall be retained as required by Technical Specification 6.10.2.o. This documentation shall contain:

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b. Become effective after review and acceptance by the PRB and the approval of the General Manager-Nuclear Plant.

Annual → c. Be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the ~~Semiannual~~ Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.18 RADIOACTIVE EFFLUENTS CONTROL PROGRAM

A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the OPERABILITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,

Unit 2

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1.0 DEFINITIONS (Continued)

SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM (PCP) shall be implemented by procedures which contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

SOLIDIFICATION

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OFFSITE DOSE CALCULATION MANUAL

Annual → The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the radioactive effluent controls required by Technical Specification 6.18 and Radiological Environmental Monitoring Program required by Technical Specification 6.19 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Surveillance Report required by Technical Specification 6.9.1.6 and the ~~Semiannual~~ Radioactive Effluent Release Report required by Technical Specification 6.9.1.8.

GASEOUS RADWASTE TREATMENT SYSTEM

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RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4^g The contents within any outside temporary tank shall be limited to ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY

At all times. This specification does not apply to disposable liners used for shipment of radioactive waste.

ACTION

- a. With the contents within any outside temporary tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents within the limit and provide notification to the Commission pursuant to Specification 6.9.1.8.

~~b. The provisions of Specification 6.9.1.13(b) are not applicable.~~

SURVEILLANCE REQUIREMENTS

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RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.6 The concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system shall be limited to ≤ 4 percent by volume.

APPLICABILITY

At all times.

ACTION

a. With the concentration of hydrogen downstream of the recombiners in the main condenser offgas treatment system exceeding the limit, restore the concentration within the limit within 48 hours.

b. The provisions of Specifications 3.0.3, ^{AND} 3.0.4, and ~~6.9.1.13(b)~~ are not applicable.

SURVEILLANCE REQUIREMENTS

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ADMINISTRATIVE CONTROLS

ANNUAL
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before May 1

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A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

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