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January 6, 1994

Docket No. 50-213
B14706

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Haddam Neck Plant
Proposed Revision to Technical Specifications
Spent Fuel Pool and New Fuel Storage Modifications

Pursuant to 10CFR50.90, Connecticut Yankee Atomic Power Company (CYAPCO) hereby proposes to amend its Operating License No. DPR-61 by incorporating the attached proposed changes into the technical specifications of the Haddam Neck Plant (Attachments 1 and 2).

## Description of the Proposed Changes

CYAPCO proposes to modify the technical specifications to increase the maximum nominal fuel enrichment allowed to be stored in both the new fuel storage racks and the spent fuel pool to a nominal 5.0 weight-percent (w/o) U-235. The proposed increase in maximum allowed fuel enrichment will be accomplished without any physical modification to the spent fuel pool or the new fuel storage racks. The number of storage locations for fuel assemblies in the spent fuel pool remains unchanged. The criticality analysis to support this proposed change was performed by Westinghouse Electric Corporation. A copy of the criticality analysis is provided in Attachment 3.

The current new fuel storage racks and spent fuel pool maximum nominal enrichment is 3.9 w/o U-235 for Zircaloy clad fuel and 4.0 w/o U-235 for Stainless Steel clad fuel. Fuel assemblies meeting these limits are allowed to be stored anywhere in the new fuel storage racks and anywhere in the spent fuel pool. Fuel burnup is not currently credited by the criticality analysis.

The proposed technical specifications dealing with the new fuel storage racks and spent fuel pool storage racks will allow an increase in the maximum nominal enrichment to 5.0 w/o U-235. The 5.0 w/o enrichment limit was calculated using the most reactive fuel assembly design planned for the Haddam Neck Plant.

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The proposed changes to the Haddam Neck Plant that are being made to accommodate the more highly enriched fuel are:

- Specification 1.38, "Type I fuel assembly," is being added to the definition section of the technical specifications to describe a fuel assembly which has an initial enrichment of less than or equal to 3.2 w/o U-235 (nominal) or a fuel assembly that has achieved a sufficient burnup that will allow it to be stored anywhere in the Haddam Neck Plant's spent fuel pool.

- Specification 1.39, "Type II fuel assemblies," is being added to the definition section of the technical specifications to describe a fuel assembly that, because of its higher initial enrichment and lower burnup level achieved, requires a controlled storage in the spent fuel pool to ensure $K_{eff}$ remains below .95. Typically, new fuel will be Type II fuel.

- A new Specification 3.9.13, "Movement of Fuel in Spent Fuel Pool," Limiting Condition for Operation, Surveillance Requirement, and Bases is proposed to be added to the Technical Specifications to require a minimum 800 ppm Boron concentration be maintained in the spent fuel pool. The criticality analysis has determined that the limiting accident in the spent fuel pool is the dropping of a new 5.0 w/o (nominal) fuel assembly between the spent fuel pool wall and an adjacent rack filled with a row of new 5.0 w/o (nominal) fuel assemblies. Per the criticality analysis, 500 ppm of Boron is required to maintain $K_{eff}$ less than .95. The proposed LCO limit of 800 ppm of Boron in the spent fuel pool was chosen to provide ample margin to the 500 ppm Boron required per the criticality analysis.

- A new Specification 3.9.14, "Spent Fuel Pool—Reactivity Condition," Limiting Condition for Operation, Surveillance Requirement, and Bases has been added. This technical specification ensures that the reactivity condition of the spent fuel pool is maintained such that $K_{eff}$ is less than or equal to .95 at all times. To accomplish this, two new figures are being added to the Technical Specifications, Figure 3.9-1, "Spent Fuel Pool Rack Minimum Burnup Requirements for Alternating Rows Storage Configuration," which provides the Burnup versus enrichment requirements and Figure 3.9-2, "Spent Fuel Pool Racks Alternating Rows Storage Configuration." To accommodate the proposed maximum fuel enrichment of 5.0 w/o (nominal) U-235, fuel burnup is credited in pre-determined spent fuel pool locations. Proposed Technical Specification Figure 3.9-2 shows the proposed spent fuel pool layout. Alternating rows of restricted spent fuel pool locations and unrestricted spent fuel pool locations are proposed. The rows of unrestricted spent fuel pool locations are for Type I fuel assemblies or Type II fuel assemblies. The rows of restricted spent fuel pool locations are only for Type I fuel assemblies. The definition of a Type I fuel assembly and a Type II fuel assembly is shown graphically in proposed Technical Specification Figure 3.9-1. Administrative controls to ensure fuel is stored in only the allowed spent fuel pool storage locations are provided.

- Specification 5.6.1.1.b is being revised to reflect the new higher enrichments allowed in the spent fuel pool along with the required storage pattern and enrichment versus burnup requirements.

- Specification 5.6.1.2.a is being revised to require polyvinyl-chloride (PVC) liners in any new fuel storage rack location that is allowed to store new fuel. The PVC liners are not credited by the criticality analysis, but are being used as a visual reference to indicate allowed new fuel storage rack locations.

- Specification 5.6.1.2.b is being revised to reflect the new higher enrichments allowed for new fuel. New Figures 5.6-1 and 5.6-2 are being added to be consistent with criticality analysis assumptions.

Fuel Assemblies with nominal fuel enrichments greater than 4.6 w/o U-235 are required to have a minimum number of fuel rods with Integral Fuel Burnable Absorbers(IFBAs). The curve showing the minimum number of fuel rods with IFBAs as a function of enrichment is attached as proposed Technical Specification Figure 5.6-1. Fuel rods containing IFBAs are a standard fuel product of Westinghouse. IFBAs consist of a thin coating of $ZrB_2$ applied to the outside of the fuel pellet. The Boron-10 in the $ZrB_2$ is the active neutron absorber. Since the burnable absorber is inside the fuel rod, the burnable absorber is not removable. The amount of Boron-10 that is applied to the fuel pellets controls the reactivity worth of the poison. Proposed Technical Specification Figure 5.6-1 shows the required number of fuel rods with IFBAs for both "1.5X" and "2.0X" IFBAs. The terms "1.5X" and "2.0X" are standard Westinghouse terms that denote the amount of Boron-10 applied to the fuel pellets. A fuel rod using a "2.0X" IFBA has more Boron-10 on an individual pellet than a "1.5X" IFBA, hence, less fuel rods with IFBAs are required for the "2.0X" IFBA to control the same amount of reactivity.

Not all fuel storage locations in the new fuel storage area may be used. Technical Specification Figure 5.6-2 shows the allowable storage locations. This restriction is not a result of the normal storage condition .95 $K_{eff}$ limit. This restriction is a result of the optimum moderation condition limit of .98 $K_{eff}$. Under this one condition, a restriction on the locations of new fuel storage was required. Administrative controls to ensure new fuel is stored in only the allowed new fuel storage locations are provided.

In addition, the Table of Contents for the Design Features section was modified to correct a typographical error.

Safety Assessment

The proposed changes to the technical specifications are to increase the maximum nominal fuel enrichment for both the new fuel storage racks and the spent fuel pool to 5.0 w/o U-235. The proposed increase in maximum allowed fuel enrichment will be accomplished without any physical modification to the spent fuel pool racks or the new fuel storage racks. The number of storage locations for fuel assemblies in the spent fuel pool remains unchanged. The criticality analysis to support this proposed change was performed by Westinghouse Electric Corporation and is included as Attachment 3.

New Fuel Storage Racks Analysis and Results

Since the new fuel storage racks are normally maintained in a dry condition, the criticality analysis shows that the rack $K_{eff}$ is less than .95 for the accidental full water density flooding scenario and less than .98 for the accidental optimum moderation flooding scenario (as described and recommended by NUREG-0800). These are the two limiting events analyzed.

The accidental full water density flooding scenario results in a $K_{eff}$ equal to .9477, including all biases and uncertainties. This is less than the .95 $K_{eff}$ limit and is therefore acceptable.

The accidental optimum moderation flooding scenario results in a $K_{eff}$ equal to .9237 including all biases and uncertainties. This is less than the .98 $K_{eff}$ limit and is therefore acceptable.

Other accidents are not analyzed for the following reasons. The normal, dry new fuel storage rack $K_{eff}$ is less than .50. The maximum reactivity increase associated with postulated accidents such as dropping a fuel assembly between the rack and wall, dropping an assembly on top of the rack or loading a fuel assembly into an unavailable location is less than 10 percent Delta-K based on Westinghouse experience. Therefore, a 10 percent Delta-K increase with a $K_{eff}$ starting at less than .50 will be considerably below the $K_{eff}$ limits discussed above for water moderation accidents in the new fuel storage racks. Postulated accidents such as dropping a fuel assembly between the rack and wall, dropping an assembly on top of the rack or loading a fuel assembly into an unavailable location in combination with a water moderation accident would be two separate independent accidents and the double contingency principle is applied.

New Fuel Storage Rack Administrative Controls

Proposed Technical Specification Figure 5.6-2 shows that certain new fuel storage rack positions are not available for fuel storage. This restriction is a result of the optimum moderation condition ($K_{eff}$ limit of .98) in the criticality analysis. The restriction on the new fuel storage location is only as a result of the optimum moderation condition of the criticality analysis. For all other normal or accident conditions, storage in all new fuel storage rack locations was acceptable.

It is important to note that the proposed technical specification restrictions on the use of new fuel storage rack locations are a continuation of current procedural restrictions already in place at the Haddam Neck Plant. The only change is that the criticality analysis now will credit the fact that the new fuel is not stored in a prohibited location.

Administrative controls will be used to ensure that new fuel is not stored in the locations marked "Unavailable for New Fuel" as shown in Figure 5.6-2.

Procedure SNM 1.4-2 entitled "Removing New Fuel From Shipping Containers," will be modified to add a precaution that prohibits storage of new fuel in the locations prohibited by the technical specification and the criticality analysis.

In addition to the procedural controls, visual references exist to ensure new fuel is placed only in the allowed new fuel storage rack locations. The new fuel locations allowed by Technical Specification Figure 5.6-2 all have a 12.75-inch diameter PVC tube installed inside the new fuel racks. These PVC tubes ensure that the new fuel is not damaged during insertion/removal or storage in the racks. These PVC tubes also provide an unmistakable visual reference as to which new fuel storage rack locations are allowed to store new fuel. The new fuel storage rack locations that are allowed to store new fuel per Figure 5.6-2, all have PVC tubes. The new fuel storage rack locations that are prohibited to store new fuel, per proposed Technical Specification Figure 5.6-2, do not have PVC tubes and are not capable of providing physical support to the new fuel assemblies. The racks that do not have PVC tubes will remain empty.

Therefore, new fuel will be stored in procedurally controlled locations consistent with the criticality analysis and the Technical Specifications. The presence of the PVC tubes in the allowed new fuel storage rack locations (and lack of PVC tubes in all the other locations) provides an unmistakable visual reference to minimize the possibility of error.

Past practice at the Haddam Neck Plant has been to store the new fuel only in new fuel storage rack locations with PVC tubes, to protect the fuel from damage. The proposed restrictions on new fuel storage locations is therefore a continuation of past practices.

The above listed procedural controls and visual references will preclude the accidental insertion of new fuel in prohibited locations. However, should fuel assemblies be accidentally located in the prohibited new fuel storage rack locations, the $K_{eff}$ limits of the new fuel storage rack are not compromised, unless an optimum moderation event is then also introduced.

Spent Fuel Pool Analysis and Results

The criticality analysis for the spent fuel pool shows that the spent fuel pool is maintained with a $K_{eff}$ less than or equal to .95 under normal and accident conditions. The criticality analysis allows storage of fuel assemblies in an alternating row pattern. Fuel assemblies stored in one row may have a nominal initial enrichment up to 5.0 w/o U-235 with no required burnup. Fuel assemblies stored in the other alternating row must have a nominal initial enrichment less than 3.2 w/o U-235 or satisfy a minimum burnup requirement.

A water temperature range of 50°F to 140°F is assumed for the normal design condition. Lower water temperature results in a more reactive condition. Water temperatures outside this normal range are considered in the accident evaluation. Three accidents were considered that do not result in an increase in $K_{eff}$ of the racks. They are:

(1) Loss of cooling systems This results in a temperature increase, which decreases $K_{eff}$.

(2) A fuel assembly drop on top of the rack There is sufficient water separation from the active fuel height of stored assemblies to preclude neutron interaction, and therefore $K_{eff}$ will not increase.

(3) A fuel assembly drop between rack modules This is not possible due to the design of the racks.

Three other accidents were considered, which would result in an increase in $K_{eff}$ of the racks. They are:

(1) A fuel misloading event The criticality analysis credits fuel burnup for pre-defined spent fuel pool locations. A fuel misloading event is very conservatively calculated by placing a 5.0 w/o (nominal) fresh fuel assembly in every other location within the fuel rows that allow burnup credit. The fuel misloading accident could result in a reactivity increase of .026 Delta k.

(2) A fuel assembly dropped between the pool wall and racks An increase in reactivity can occur if a fuel assembly is dropped between the pool wall and racks. This was calculated by assuming that a fresh 5.0 w/o (nominal) U-235 enriched fuel assembly was dropped between the rack wall and a rack filled with an outer row of fresh 5.0 w/o (nominal) U-235 enriched fuel assemblies. The fuel drop accident could result in a reactivity increase of .041 Delta k.

(3) A cooldown event A cooldown event between 50°F and 32°F would result in an increase in reactivity of .0009 Delta k.

The fuel misloading accident and the fuel drop accident between the spent fuel pool wall and an adjacent rack will be mitigated by requiring a minimum boron concentration in the spent fuel pool during fuel handling activities. The cooldown reactivity change is so small that sufficient margin is available under non-accident conditions ($K_{eff}$ = .9457 versus .95 limit) to accommodate such a small reactivity change.

The results of the spent fuel pool criticality analysis under non-accident conditions is $K_{eff}$ .9457 including all biases and uncertainties. This is less than the .95 $K_{eff}$ limit and is therefore acceptable.

The effects of this modification will also be reviewed against the thermal hydraulic capabilities of the spent fuel pool, racks and support systems. Radiological effects are unchanged by the increase in enrichment.

Spent Fuel Pool Administrative Controls

The current spent fuel pool maximum nominal enrichment is 3.9 w/o U-235 for Zircaloy clad fuel and 4.0 w/o U-235 for Stainless Steel clad fuel. Fuel assemblies meeting these limits are allowed to be stored anywhere in the spent fuel pool. Currently, credit for fuel burnup is not taken.

A key aspect of the proposed Technical Specification Figure 3.9-1 is that the required burnups are very small. Currently, all fuel in the Haddam Neck Plant spent fuel pool (approximately 700 fuel assemblies) meet the requirements of proposed Technical Specification Figure 3.9-1. Therefore, a misloading event with the proposed Technical Specifications in the spent fuel pool is not even possible at this time, given the current fuel inventory in the spent fuel pool. A review of proposed Technical Specification Figure 3.9-1 shows that the required fuel burnups are small enough that during a complete core offload/reload, even the once burned fuel will likely meet the requirements for storage in the restricted row locations.

The only realistic challenge to having a fuel misloading event with the proposed Technical Specifications is when new fuel is loaded into the spent fuel pool. To minimize the possibility of a misloading event, loading of the new fuel into the spent fuel pool will have special administrative controls. A procedural requirement will be put in place which ensures that, prior to moving new fuel to the spent fuel pool, a region of the spent fuel pool will be designated for storage of the new fuel. Within this designated region, all restricted fuel rows must be completely full with qualified fuel (Type I fuel). Since all restricted fuel rows would be full with Type I fuel, there can be no possibility of misloading new fuel in this pre-designated region.

Further, the possibility of new fuel misloading is minimized due to the obvious physical difference between new fuel, which has a shiny, new appearance and spent fuel which is visible to the fuel handlers performing the actual fuel movement. Because the new fuel would be lined up in a row configuration, it would be obvious to the fuel handlers if a fresh fuel assembly was going to be accidentally placed in a restricted fuel row.

Notwithstanding the above, additional procedural controls will be put in place to ensure only properly qualified Type I fuel assemblies are placed in the restricted fuel locations. A form will be established that will document which fuel assemblies meet the requirements of Type I fuel, as proposed in Technical Specification Figure 3.9-1. For a fuel assembly's serial number to be placed on this form, a fuel assembly's burnup records will be reviewed, appropriate uncertainties will be applied, and the resulting burnup must be greater than that required by proposed Technical Specification Figure 3.9-1 to qualify as a Type I fuel assembly. Prior to moving any fuel assembly into a restricted location in the spent fuel pool, the fuel assembly in question must be verified to be on the previously mentioned form. Further, all fuel movement in the spent fuel pool, whether to restricted or unrestricted locations, will require double verification that the fuel assembly is going into (or is being removed from) the correct spent fuel pool location.

Existing procedures already require that fuel assemblies be verified to be in the correct spent fuel pool location by verification of fuel assembly serial numbers after each major fuel movement in the spent fuel pool, such as refueling. This existing requirement, in combination with the double verification for individual fuel assemblies, is sufficient to ensure that the correct fuel assembly is being moved to the correct location.

Further, despite the previous discussion and administrative controls, should fuel be misloaded into the restricted locations of Technical Specification Figure 3.9-2, the effect on the spent fuel pool $K_{eff}$ is addressed in the criticality analysis. The misloading of a 5.0 (nominal) w/o fresh fuel assembly in every other location of the restricted rows results in an increase in the $K_{eff}$ of the spent fuel pool of .026 $K_{eff}$. This is equal to about 250 ppm Boron in the spent fuel pool to compensate for the .026 $K_{eff}$ increase. The limiting accident condition is not a fuel misloading event, but the dropping of a fresh fuel assembly between the spent fuel pool wall and adjacent rack, which requires 500 ppm of boron in the spent fuel pool water. The proposed surveillance requirement is 800 ppm Boron in the spent fuel pool during all fuel handling activities to ensure, during postulated accidents, $K_{eff}$ of the spent fuel pool is maintained less than .95. Typically, about 2000 ppm of Boron is kept in the spent fuel pool at all times.

Based on these considerations, the administrative controls are adequate to maintain the required $K_{eff}$ limits of the spent fuel pool.

## Significant Hazards Consideration

In accordance with 10CFR50.92, CYAPCO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed change to the technical specifications is to increase the maximum nominal fuel enrichment for both the new spent fuel racks and spent fuel pool to a nominal 5.0 w/o U-235. The proposed increase in maximum allowed fuel enrichment will be accomplished without any physical modifications to the spent fuel pool rack or new fuel storage rack. The number of storage locations for fuel assemblies in the spent fuel pool remains unchanged.

New Fuel Racks

Since the new fuel storage racks are normally maintained in a dry condition, the criticality analysis shows that the rack $K_{eff}$ is less than .95 for the accidental full water density flooding scenario and less than .98 for the accidental optimum moderation flooding scenario. These are the two limiting events analyzed.

The results of the accidental full water density flooding scenario is $K_{eff}$ = .9477 including all biases and uncertainties. This is less than the .95 $K_{eff}$ limit and is therefore acceptable.

The results of the accidental optimum moderation flooding scenario is $K_{eff}$ = .9237 including all biases and uncertainties. This is less than the .98 $K_{eff}$ limit and is therefore acceptable.

Other accidents are not analyzed for the following reasons. The normal, dry new fuel storage rack $K_{eff}$ is less than .50. The maximum reactivity increase associated with postulated accidents such as dropping a fuel assembly between the rack and wall, dropping an assembly on top of the rack or loading a fuel assembly into an unavailable location is less than 10 percent Delta-K based on Westinghouse experience. Therefore, a 10 percent Delta-K increase with a $K_{eff}$ starting at less than .50 will be considerably below the $K_{eff}$ limits discussed above for water moderation accidents in the new fuel storage racks.

Spent Fuel Pool

The criticality analysis for the spent fuel pool shows that the spent fuel pool is maintained with a $K_{eff}$ less than or equal to .95 under normal and accident conditions. The criticality analysis allows storage of fuel assemblies in an alternating row pattern. Fuel assemblies stored in one row may have a nominal initial enrichment up to 5.0 w/o U-235 with no required burnup. Fuel assemblies stored in the other alternating row must have a nominal initial enrichment less than 3.2 w/o U-235 or satisfy a minimum burnup requirement.

Three accidents were considered, but none result in an increase in $K_{eff}$ of the racks.

(a) Loss of cooling systems result in a temperature increase, which decreases $K_{eff}$.

(b) A fuel assembly drop on top of the rack has sufficient water separation from the active fuel height of stored assemblies to preclude neutron interaction, and therefore $K_{eff}$ will not increase.

(c) A fuel assembly drop between rack modules is not possible due to the design of the racks.

The effects of this modification will also be reviewed against the thermal hydraulic capabilities of the spent fuel pool, racks, and support systems. Radiological effects are unchanged by this increase in enrichment.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

Three other accidents were also considered, which would result in an increase in $K_{eff}$ of the racks. They were:

(a) A fuel misloading event conservatively calculated by placing a 5.0 w/o fresh fuel assembly in every other location within the fuel rows that allow burnup credit. This event results in a reactivity increase of .026 delta-K.

(b) An increase in reactivity can occur if a fuel assembly is dropped between the pool wall and racks. This was calculated by assuming that a fresh 5.0 w/o U-235 enriched fuel assembly was dropped between the rack wall and a rack filled with an outer row of fresh 5.0 w/o U-235 enriched fuel assemblies. This event could result is an increase in reactivity of .041 Delta-K.

(c) A cooldown event between the lower limit of 50°F and 32°F would result in an increase in reactivity. This event could result in a reactivity increase of .0009 Delta-K.

The fuel misloading accident and the fuel drop accident between the spent fuel pool wall and an adjacent rack will be mitigated by requiring a minimum boron concentration in the spent fuel pool during fuel handling activities. The cooldown reactivity change is so small that sufficient margin is available under nonaccident conditions ($K_{eff}$ = .9457 versus .95 limit) to accommodate such a small reactivity change.

Radiological consequences are not affected because dose contributions are all short half-life and reach equilibrium in the core within 1 to 3 months. Radiological consequences are only dependent on power level and not enrichment or burnup.

3. Involve a reduction in a margin of safety.

   There is no reduction in the margin of safety since $K_{eff}$ remains less than or equal to .95 (.98 for the optimum moderation flooding scenario) under all analyzed conditions using conservative assumptions. Radiological effects are unchanged by this increase in enrichment.

Moreover, the Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not-likely to involve a significant hazards consideration. The proposed change is similar to example (ii) which is a change that constitutes an addition, limitation, restriction, or control not presently included in the technical specification. The addition of an additional spent fuel pool storage area (with additional administrative controls) for fuel assemblies constitutes an additional limitation not presently included in technical specifications. The consequences remain unchanged and the margin of safety is not impacted.

CYAPCO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not increase the types and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, CYAPCO concluded that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Haddam Neck Plant Nuclear Review Board has reviewed and approved the proposed license amendment and has concurred with the above determination.

Attachment 1 provides a markup of proposed changes, whereas Attachment 2 provides retyped pages of the Haddam Neck Plant Technical Specifications. The retype of the proposed changes to technical specifications in Attachment 2 reflects the currently issued version of technical specifications. Technical specification changes previously submitted are not reflected in these pages. Therefore, the revised pages should be reviewed for continuity with the current technical specifications prior to issuance.

Regarding our proposed schedule for this amendment, we request issuance no later than August 1, 1994, with the amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

In accordance with 10CFR50.91(b), we are hereby providing the State of Connecticut with a copy of this proposed amendment.

If you should have any questions regarding this submittal, please contact us.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

J. F. Opeka
J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
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Subscribed and sworn to before me

this 6 day of January, 1994

Lorraine J. D'Amico

Date Commission Expires: 3/31/98