CP&L

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SERIAL: BSEP 95-0605
10 CFR 50.90
TSC 95TSB34

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPP-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

Gentlemen:

By letter dated September 13, 1995 (Serial: BSEP 95-0316), Carolina Power & Light Company (CP&L) submitted license amendment requests to the Nuclear Regulatory Commission (NRC) to revise the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments were to revise Technical Specifications 3/4.6.1.2 and 3/4.6.1.3 by removing detailed requirements describing Type B and C testing for primary containment isolation valves and penetrations and leakage testing for primary containment air locks. Instead, the Technical Specifications were to adopt wording that provided a general reference to 10 CFR Part 50, Appendix J.

Subsequently, on September 26, 1995, the NRC published in the *Federal Register* a notice of the approval and issuance of a final rule for primary reactor containment leakage testing for water-cooled power reactors (60 FR 49495). Based on the issuance of the final rule, as well as subsequent discussions with members of the NRC Staff, CP&L hereby amends our September 13, 1995 license amendment application to address the revisions necessary due to issuance of the final rule.

Enclosure 1 provides a description of the revisions being made to the original license amendment request.

Enclosure 2 details the Company's revised basis that the proposed changes, as amended, do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation which demonstrates that the proposed license amendments meet the eligibility for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the marked-up Technical Specification pages for Unit 1.

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Enclosure 6 provides the marked-up Technical Specification pages for Unit 2.

Enclosure 7 provides the typed Technical Specification pages for Unit 1.

Enclosure 8 provides the typed Technical Specification pages for Unit 2.

Carolina Power & Light Company is providing, in accordance with 10 CFR 50.91(b), Mr. Dayne H. Brown of the State of North Carolina with a copy of the amended proposed license amendments.

In order to support work activities being conducted during the upcoming Unit 2 refueling outage, which is presently scheduled to begin on February 2, 1996, CP&L requests approval and issuance of the proposed license amendments no later than January 15, 1996. In order to allow sufficient time for procedure revision and orderly incorporation of the amendments into the Technical Specifications copies, CP&L requests that the proposed amendments be issued with an effective date of February 15, 1996 (i.e., 30 days following approval and issuance).

Please refer any questions regarding this submittal to Mr. George Honma at (910) 457-2741.

Sincerely,

William R Campbell

William R. Campbell

WRM/wrm

Enclosures:

1. Description of Amended Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Marked-up Technical Specification Pages - Unit 1
6. Marked-up Technical Specification Pages - Unit 2
7. Typed Technical Specification Pages - Unit 1
8. Typed Technical Specification Pages - Unit 2

William R. Campbell, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, and agents of Carolina Power & Light Company.

Notary (Seal)

My commission expires: August 12, 1996

pc: Mr. D. H. Brown, State of North Carolina
Mr. S. D. Ebneter, Regional Administrator, Region II
Mr. D. C. Trimble, Jr., NRR Project Manager - Brunswick Units 1 and 2
Mr. C. A. Patterson, Brunswick NRC Senior Resident Inspector
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

BASIS FOR CHANGES

Background:

On September 13, 1995 (Serial: BSEP 95-0316), Carolina Power & Light Company submitted a request to the Nuclear Regulatory Commission (NRC) to revise the Technical Specifications for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The purpose of these license amendment requests was to remove detailed requirements describing Type B and C testing for primary containment isolation valves and penetrations and remove detailed requirements describing leakage testing for primary containment air locks. These detailed requirements were to be replaced with more general wording that referenced the same requirements located in 10 CFR Part 50, Appendix J.

Subsequently, on September 26, 1995, the NRC published in the *Federal Register* a notice of the issuance and approval of a final rule regarding primary reactor containment leakage testing for water-cooled power reactors (60 FR 49495). The new final rule amends 10 CFR 50, Appendix J to provide a performance-based option for leakage rate testing of containments. The performance-based testing approach is available as an option to power reactor licensees and can be followed in lieu of the prescriptive requirements previously contained in 10 CFR 50, Appendix J. The prescriptive requirements are still considered an acceptable testing approach and are being retained in 10 CFR 50, Appendix J as "Option A."

Basis For Proposed Changes:

The safety objective for reactor containments is stated in 10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants." General Design Criterion (GDC) 16, "Containment Design" requires "an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment..." for postulated accidents. The previous version of 10 CFR Part 50, Appendix J implemented GDC 16 through prescriptive containment leakage testing requirements that stipulated the tests that should be performed, the frequency of testing, and reporting of test results.

The revised 10 CFR 50, Appendix J regulation maintains the prescriptive leakage testing requirements (now referred to as Option A), but now recognizes a performance-based leakage testing program (referred to as Option B) as an acceptable alternative to the prescriptive (Option A) requirements. This performance-based leakage testing approach allows test intervals to be based on system and component testing performance, thereby providing greater flexibility and cost-benefit in implementing the safety objectives of the regulation.

The new 10 CFR 50, Appendix J, Option B regulation states that licensees may adopt Option B, or parts thereof, by submitting their implementation plan and a request for Technical Specification revisions. 10 CFR 50, Appendix J, Option B, section V, paragraph B.3 states that

NRC Regulatory Guide 1.163 or other implementation document being used by a licensee to develop a performance-based leakage testing program must be included, by general reference, in the facility Technical Specifications. The regulation also states that the Technical Specification revisions must "contain justification, including supporting analyses, if the licensee chooses to deviate from methods approved by the Commission and endorsed in the regulatory guide."

Carolina Power & Light Company requests NRC approval to implement the performance-based leakage testing approach for the Brunswick Steam Electric Plant, Units 1 and 2. The Company intends to implement this approach in accordance with NRC Regulatory Guide 1.163, Revision 0 dated September 1995, "Performance-Based Containment Leak-Test Program" and Nuclear Energy Institute (NEI) 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50 Appendix J," with the exception of:

1. NEI 94-01, Section 8.0, "Testing Methodologies For Type A, B and C Tests" states that "Type A, Type B and Type C tests should be performed using the technical methods and techniques specified in ANSI/ANS 56.8-1994, or other alternative testing methods that have been approved by the NRC." A comparison of the current local leak rate test (LLRT) program and the requirements established within ANSI 56.8-1994 for Type B and C tests was performed. With the exception of flowmeter accuracy, the current LLRT test program meets the requirements of ANSI 56.8-1994 in terms of test methodology. Brunswick Plant uses standard glass tube and ball type flowmeters with a 5 percent of full scale accuracy. Readings are compensated for back pressure, temperature, and test medium variables. To overcome the less accurate flowmeter use, an equipment error is applied to the results of each test. The square root of the sum of the squares of the equipment errors for the tests is also added to the cumulative containment leakage total. Brunswick Plant administrative procedures and databases already effectively address instrument error. This method is consistent with ANSI N56.8-1987 Appendix E and provides conservative assurance that the cumulative containment leakage total accounts for instrument inaccuracy. No such instrument error analysis or accounting is required per ANSI 56.8-1994.

   In addition, this deviation has been discussed with members of the ANSI 56.8 committee to understand the reason for the revision to the standard. Essentially, the committee felt that if flowmeter inaccuracy was maintained to within 2 percent, administration of the leak rate program could be simplified by exclusion of instrument error in the cumulative leakage total.

   As such, the Brunswick Plant takes exception to ANSI/ANS 56.8-1994 flowmeter accuracy requirements based upon compensation of instrument inaccuracies applied to the containment leakage total per the previous revision of the standard.

Proposed Technical Specification revisions for implementing 10 CFR 50, Appendix J, Option B based on the Improved Technical Specifications for BWR/4s have been discussed by representatives from NEI, the four reactor Owners' Groups, and the NRC staff. As a result of these discussions, model revisions to the Improved Technical Specifications to address the Option B requirements have been posted on the NRC's Tech Spec Plus computer bulletin board system and have been included in a letter dated November 2, 1995 from Mr. C. I. Grimes (USNRC) to Mr. D. J. Modeen (NEI). Even though the current Brunswick Plant Technical Specifications are not based on the BWR-4 Improved Technical Specifications (ITS), Carolina Power & Light Company has used the model BWR/4 ITS changes incorporating Appendix J, Option B to prepare the proposed revisions to the Brunswick Technical Specifications provided herein. A summary of the Brunswick-specific changes is provided below:

1. Specification 3/4.6.1.2:

A. Specification 3.6.1.2.a.2 regarding reduced pressure containment leakage testing is being deleted since reduced pressure testing is not an option available under the Regulatory Guide 1.163/NEI 94-01 performance-based leakage testing program.

B. Specification 3.6.1.2.b and the associated ACTION statements are being revised to indicate that the combined leakage rate for valves and penetrations shall be in accordance with the new Primary Containment Leakage Rate Testing Program. The Table 3.6.3-1 reference is being removed because this table has been previously relocated from the Technical Specifications (Amendments 149 and 179 for Unit 1 and Unit 2, respectively).

C. Specification 4.6.1.2 has been renumbered to 4.6.1.2.1 and revised to require the performance of primary containment leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program described in the new Specification 6.8.3.4.

Since a performance-based leakage testing program is being established and will be controlled through the Primary Containment Leakage Rate Testing Program, the detailed requirements regarding Type B and C testing (Specification 4.6.1.2.d) are being deleted.

Containment air locks are already required to be tested pursuant to Specification 4.6.1.3; therefore, Specification 4.6.1.2.e is duplicative and is being deleted.

Specification 4.6.1.2.f, which requires that main steam isolation valves be tested at least once per 18 months, is being retained and renumbered to 4.6.1.2.2. Regulatory Guide 1.163 states test frequencies for certain penetrations including feedwater and main steam line isolation valves, as well as containment venting and purge for BWRs, should be limited to 30 months with consideration given to operating experience and safety significance. Main steam line isolation valves are outside the scope of performance-based testing and leakage testing of these valves will continue to be performed in accordance with current Technical Specification 4.6.1.2.f.

The statement that the provisions of Specification 4.0.2 are not applicable to 24 month surveillance intervals (Specification 4.6.1.2.h) is being deleted. The references to a 24-month test frequency in Specification 4.6.1.2.d are being removed since the performance-based leakage rate testing program will establish the specific test frequencies based on component and system performance.

2. Specification 3/4.6.1.3:

A. Specification 4.6.1.3.a.1 is being revised to require verification of the primary containment air lock seal leakage rate within 7 days (versus the current 72 hour period) after each closing. The 7-day test frequency is consistent with the test frequency specified in NEI 94-01, Section 10.2.2.1 (Containment Airlocks — Test Intervals). Verification of the primary containment air lock seal leakage rate after multiple entries is being required at least every 30 days (versus the current

72 hours). The 30-day test frequency for the period of multiple containment entries is also consistent with the frequency specified in NEI 94-01, Section 10.2.2.1 (Containment Airlocks — Test Intervals).

B. Specification 4.6.1.3.b.1 is being revised to require performance of an overall air lock leakage rate test every 30 months instead of the current six-month frequency. The 30-month test frequency is consistent with the periodic test frequency specified in NEI 94-01, Section 10.2.2.1 (Containment Airlocks — Test Intervals).

3. Specification 3/4.6.1.4:

A. Specification 4.6.1.4.1 is being revised to require the performance of visual examinations of the accessible areas of the primary containment interior and exterior surfaces consistent with NRC Regulatory Guide 1.163, Section C, "Regulatory Position," Paragraph 3. These examinations will be conducted prior to performing a Type A test and during two other refueling outages before the next Type A test (if the interval for the Type A test has been extended to 10 years).

4. Specification 6.8.3:

A. The title for Specification 6.8 is being revised to "Procedures, Programs, and Manuals."

B. Specification 6.8.3 is being revised to add a title "Programs and Manuals."

C. Specification 6.8.3.a is being renumbered to 6.8.3.1, Specification 6.8.3.b is being renumbered to 6.8.3.2, and Specification 6.8.3.c is being renumbered to 6.8.3.3.

D. A new Specification 6.8.3.4 is being added to describe the Primary Containment Leakage Rate Testing Program. The Specification states that the program implements primary containment leakage rate testing as required by 10 CFR 50, Appendix J, Option B and the guidelines contained in NRC Regulatory Guide 1.163, Revision 0 dated September 1995. Specification 6.8.3.4 will identify the plant-specific value for L_a, the maximum allowable primary containment leakage rate, and the value for P_a, the peak calculated primary containment internal pressure. The values of P_a and L_a are currently referenced in Specifications 3/4.6.1.2 and 3/4.6.1.3 and are not being changed as part of this license amendment request. Also, Specification 6.8.3.4 will identify the approved plant-specific exceptions to the implementation process stipulated in NRC Regulatory Guide 1.163 and NEI 94-01.

5. Bases:

A. The Bases for Specification 3/4.6.1.1 have been expanded to clarify the safety objectives stipulated in 10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants" for primary containments. Also, the regulatory requirements contained in 10 CFR 50, Appendix J, Option B and the requirements provided in NRC Regulatory Guide 1.163 and NEI 94-01 for implementation of a performance-based containment leakage rate testing program have been described, along with any exceptions being taken to these regulatory positions. A reference to the granting of a previous exemption from 10 CFR 50 regarding the testing of air locks

after each opening is being deleted since the requirements of Regulatory Guide 1.163 and NEI 94-01 will now be followed.

B. The Bases for Specification 3/4.6.1.2 have been expanded to address the regulatory requirements for air locks for primary containments. The regulatory requirements contained in 10 CFR 50, Appendix J, Option B and the implementation requirements provided in NRC Regulatory Guide 1.163 and NEI 94-01 pertaining to air lock leakage testing have been described.

C. The Bases for Specification 3/4.6.1.3 have been modified to address the regulatory basis for performing the visual examinations of the accessible containment interior and exterior surfaces.

References:

1. "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," 10 CFR Part 50, Appendix J, published in the Federal Register on September 26, 1995 (60 FR 49495).

2. NRC Regulatory Guide 1.163, Revision 0, "Performance-Based Containment Leak-Test Program," September 1995.

3. Nuclear Energy Institute guidance document NEI 94-01, Revision 0, "Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," July 26, 1995.

4. NUREG-1493, "Performance-Based Containment Leakage-Test Program."

5. ANSI/ANS 56.8-1994, "Containment System Leakage Testing Requirements."

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed these proposed license amendment requests and believes that their adoption would not involve a significant hazards consideration. The basis for this determination follows.

1. The proposed license amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed license amendments revise the Technical Specifications to reflect the adoption of a performance-based containment leakage-testing program. The Nuclear Regulatory Commission has approved the use of a performance-based option for containment leakage testing programs when it amended 10 CFR Part 50, Appendix J (60 FR 49495).

   For adoption of the revised regulations, licensees are required to incorporate into their Technical Specifications, by general reference, the NRC regulatory guide or other plant-specific implementing document. A new Administrative Control subsection is being added to the Brunswick Plant Technical Specifications that requires the establishment and maintenance of a Primary Containment Leakage Rate Testing Program. As stated in the Technical Specification, this Primary Containment Leakage Rate Testing Program will conform with NRC Regulatory Guide 1.163, Revision 0, dated September 1995, "Performance-Based Containment Leak-Rate Testing Program" by establishing leakage testing intervals based on the criteria in Section 11.0 of NEI 94-01. The Technical Specifications will continue to require performance of a periodic general visual inspection of the containment to ensure early detection of any structural deterioration of the containment system that might occur.

   The effect of increasing containment leakage rate testing intervals has been evaluated by the Nuclear Energy Institute using the methodology described in NUREG-1493 and historical representative industry leakage rate testing data. The results of this evaluation, as published in NEI 94-01, Revision 0, are that the increased risk corresponding to the extended test interval is small (less than 0.1 percent of total risk) and compares well to the guidance of the NRC's safety goal. Therefore, adoption of performance-based verification of leakage rates for isolation valves, containment penetrations, and the overall containment boundary will provide an equivalent level of safety and does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed license amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated. No safety-related equipment, safety function, or plant operations will be altered as a result of the proposed license amendment.

The safety objective for the primary containment is stated in 10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants." The safety function of the primary containment will be met since the containment will continue to provide "an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment..." for postulated accidents. Therefore, the proposed license amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed license amendments do not involve a significant reduction in a margin of safety. As stated above, the Nuclear Regulatory Commission has approved the use of a performance-based option for containment leakage testing programs when it amended 10 CFR Part 50, Appendix J (60 FR 49495). The new Primary Containment Leakage Rate Testing Program will conform with NRC Regulatory Guide 1.163, Revision 0, dated September 1995, "Performance-Based Containment Leak-Rate Testing Program" by requiring that leakage testing intervals be established based on the criteria in Section 11.0 of NEI 94-01, Revision 0.

   As discussed in Part 1 above, the effect of increasing containment leakage rate testing intervals has been evaluated by the Nuclear Energy Institute using the methodology described in NUREG-1493 and historical representative industry leakage rate testing data. The results of this evaluation, as published in NEI 94-01, Revision 0, are that the increased safety risk corresponding to the extended test intervals is small (less than 0.1 percent of total risk) and compares well to the guidance of the NRC's safety goal. In addition, as demonstrated by risk analyses contained in NUREG-1482, relaxation of the integrated leak rate test frequency does not significantly increase the probability or consequences of a previously evaluated accident. Integrated leakage rate tests have been demonstrated to be of limited value in detecting significant leakages from penetrations and isolation valves. Therefore, the proposed license amendments adopting a performance-based approach for verification of leakage rates for isolation valves, containment penetrations, and the containment overall will continue to meet the regulatory goal of providing an essentially leak-tight containment boundary, will provide an equivalent level of safety, and do not involve a significant reduction in a margin of safety.

   The revised Technical Specifications will continue to maintain the allowable leak rate (L_a) as the Type A test performance criterion. In addition, a requirement to perform a periodic general visual inspection of the containment has been maintained as part of the performance-based leakage testing program.

   The revised Technical Specifications will continue to maintain the allowable leak rate (L_a) as the Type B and C tests' performance criterion. As supported by the findings of NUREG-1493, the percentage of leakages detected only by integrated leak rate tests is small (only a few percent) and Type B and C leakage tests are capable of detecting more than 97 percent of containment leakages and virtually all such leakages are identified by local leak rate tests (LLRTs) of containment isolation valves.

   Thus, the proposed license amendments do not involve a significant reduction in a margin of safety and will continue to ensure the revised Appendix J regulatory goal of ensuring an essentially leak-tight containment boundary.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides a criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in an increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and believes that the proposed amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement of environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

1. These amendments do not involve a significant hazards consideration, as shown in Enclosure 2.

2. The proposed license amendments do not result in a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed license amendments do not introduce any new containment boundary changes nor do these proposed license amendments require any existing containment boundary systems to perform a different type of function than they are presently designed to perform. The proposed license amendments do not alter the function of existing containment boundary equipment and will ensure that the consequences of any previously evaluated accident do not increase. Therefore, CP&L has concluded that there will not be a significant increase in the types or amounts of any effluent that may be released offsite and, as such, does not involve irreversible environmental consequences beyond those already associated with normal operation.

3. These amendments do not result in an increase in individual or cumulative occupational radiation exposure. Implementation of a performance-based containment leakage rate testing approach will allow test intervals to be based on system and component performance. Therefore, the increased test intervals that are permitted under a performance-based leakage testing program are actually expected to decrease cumulative occupational exposure

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
NRC DOCKET NOS. 50-325 AND 50-324
OPERATING LICENSE NOS. DPR-71 AND DPR-62
SUPPLEMENT TO REQUESTS FOR LICENSE AMENDMENTS
CONTAINMENT LEAKAGE RATE TESTING

PAGE CHANGE INSTRUCTIONS UNIT 1	
Removed page	Inserted page
XV	XV
3/4 6-2	3/4 6-2
3/4 6-3	3/4 6-3
3/4 6-5	3/4 6-5
3/4 6-6	3/4 6-6
B 3/4 6-1	B 3/4 6-1
---	B 3/4 6-1a
B 3/4 6-2	B 3/4 6-2
---	B 3/4 6-2a
6-16	6-16
6-17	6-17
---	6-17a

PAGE CHANGE INSTRUCTIONS UNIT 2	
Removed page	Inserted page
XV	XV
3/4 6-2	3/4 6-2
3/4 6-3	3/4 6-3
3/4 6-5	3/4 6-5
3/4 6-6	3/4 6-6
B 3/4 6-1	B 3/4 6-1
---	B 3/4 6-1a
B 3/4 6-2	B 3/4 6-2
---	B 3/4 6-2a
6-16	6-16
6-17	6-17
---	6-17a