WELATED CORRESPONDENCE

DOCKETED

February 26, 1985

*85 FEB 28 AIO:45

CETTOT OF SECRETARY

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

NOTICE TO COMMISSION, APPEAL BOARD LICENSING BOARD AND PARTIES

In the Matter of)
METROPOLITAN EDISON COMPANY	Docket No. 50-289 SP (Restart)
(Three Mile Island Nuclear Station, Unit No. 1))

On November 3, 1983, February 27, 1984 and August 9, 1984, Licensee provided copies of status reports on its response to recommendations made to Licensee in a BETA Report, dated February 28, 1983. The latest of these reports is enclosed for information.

Respectfully submitted,

Ernest L. Blake, Jr., P.C.
SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202)822-1084
Counsel for Licensee

Enclosure cc: Service List

> 9503010314 850225 PDR ADOCK 05000289 PDR

DS03



RESPONSES TO RECOMMENDATIONS OF BASIC ENERGY TECHNOLOGY ASSOCIATES, INC. AS SET FORTH IN THEIR REPORT DATED FEBRUARY 28, 1983

SORT BY BETA FINDING OF OPEN ITEMS

SEMI-ANNUAL STATUS UPDATE- 1984 ISSUE DATE: FEBRUARY 20, 1985 The review of current and projected expenditures and manpower utilization for GPU Nuclear Corporation conducted by Basic Energy Technology Associates, Inc. (BEIA) was issued in a report dated February 28, 1983.

of A total The focus of the review was on resources devoted to Three Mile Island Unit 1 and Oyster Creek. eighty-five (85) findings resulted in one hundred fifty-six (156) separate recommendations.

of The 156 recommendations (paraphrased) have been assigned to one This report represents the GPUNC Response. five (5) broad categories:

- Organization understanding and working within the functional GPUN structure.
- Manning appropriate staffing levels.
- III. Operating/Management Efficiency/Productivity
- IV. Personnel-Related Matters personnel practices.
- . Training

Within each of the above categories, responses have been placed into one of five classifications (STATUS CODE):

- A. Agree Complete: agree with recommendation, action is complete.
- Agree Action Underway/Goal: agree with recommendation, action is underway and/or action is a 1983 goal.
- Agree Action to be Scheduled: agree with recommendation, action to be taken in the future.
- Under Evaluation: either recommendation or appropriate action is under evaluation.
- E. Disagree: disagree with recommendation.

This report is sorted by BETA finding and recommendation and includes only OPEN items.

The GPUNC Response Report (sorted by BEIA finding) will be updated semi-annually until completion. This revision contains the second half 1984 updated status. Since the last update, 27 additional open items have been completed (as noted by asterisk in the comment column) for a total complete or disagree of 154 with the remaining 2 open items due for review or completion in 1985.

TABLE OF CONTENTS

BETA FINDINGS & RECOMMENDATIONS	PAGE
TMI-1 Plant and Division	1-2
G.C. Plant and Division	3-5
Nuclear Assurance Division	6
Technical Functions Division	7-8
Administration Division	9-10
Human Resources Division	11
Radiological & Environmental Controls Division	
Maintenance & Construction Division	
Communications Division	-
General	12-14

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	COMMENTS
Finding III-C:	Mainte	nance at TMI-1 can improve its support of the plant.				
111-C (b)	Rec: Resp:	Assign system responsibility in Plant Engineering for maintenance tasks. Our goal remains to assign responsibility for each plant system to a specific engineer; i.e., establish a program of "system experts". A major reorganization of the Plant Engineering Department was scheduled for 4th Quarter 1984. Because of significant efforts required for restart and steam generator repairs, this reorganization was delayed until the 1st Q 1985. This effort is in progress and includes the assignment of responsibility for each plant system to a specific engineer. Completion 1st Q 1985.	1.	TMI-1	В	1st Q 1985
III-C (c)	Rec: Resp:	Delay assignment of corrective maintenance function to M&C until after Unit 1 restart. Formal assignment of CM function to M&C will not take place until after Restart. rehouse inventory records have enough nomenclature inaccur	I.	0/P	A*	Complete. Assignment after restart.
111-G-1	Rec: Resp:	Program to improve nomenclature of inventory records. Although the current M&S inventory record system limits description of inventory items to 40 characters, the introduction of AMMS has provided a source of improved nomenclature which, when used in conjunction with the M%S system, dramatically reduces the reported problem. Ongoing efforts to improve descriptions have made marked progress. With the emergence of a Standardized Preferred Parts List, as part of the Charter assigned to the Material Requirements Planning Group (now being established), we believe the problem will be fully solved. On the basis of progress to date, and in view of the ongoing enhancements being provided by AMMS descriptions, we recommend this item acclosed.	111.	Admin./ TMI-1/ M&C	A*	Complete. M&C Division will support Materials Management in this effort to improve nomenclature of inventory records. TMI-1 Division will support Materials Management in this effort to improve nomenclature of inventory records as resources permit.

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
Finding III-G-2:	The am	ount of stock at TMI is excessive.				
111-G-2	Rec: Resp:	Purge TMI stock of unnecessary material. A proposal to separately fund for material obsolescense had been planned, but now appears to be in question pending Accounting review. While we encounter difficulties in obtaining engineering continue to support to verify what materials are obsolete, we continue to send monthly reports to each of the site organizations in order to keep them fully informed of materials which are available in the warehouse and which have not had usage over the last three years. This has resulted in some issue activity for material which would have otherwise been newly procured.	ш.	Admin.	В	Review for status mid-1985. Need commitment for TMI-1 assignment of resources to support a reasonable closeout.
Finding III-I:	A revi	ew of the number of people assigned to administration work at	TMI -1	appears exc	essive.	
111-1	Rec: Resp:	Look to reduce on-site clerical/admin. support. Operations Analysis is systematically studying all clerical/administrative support positions on a division-by-division basis. A review of IMI-1 non-except, non-bargaining secretarial positions was completed in 1983. A review of Nuclear Assurance clerical support positions at IMI was completed in December 1984. Studies are planned for IMI based Rad Con and IMI Information Center administrative support positions during 1985. We believe that further actions to reduce staff or conduct staff utilization analyses should result from specific requests by the cognizant Division Directors.	11.	IMI-1/ Admin.	A*	Complete. Ongoing budget reviews and load program will continue to laddress.

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	CONTENTS
Finding IV-D-2:	The sanctity of coffee breaks at Oyster Creek is a sizeable cont	ributor t	o poor prod	uctivity.	
IV-D-2 (b)	Resp: Eliminate p.m. break or allow management to determine timing. Resp: Management has ability to set whether break is allowed and if so, the timing. Management rights identified to all managers and supervisors after Company/Union negotiations by JCP&L in training programs and GPUNC directives. There are not authorized afternoon coffee breaks. This subject will be included in supervisory training programs that are to be planned during 1985. With the subject included in the planning stage of the training programs, this item should be considered closed.	IV.	H. R./ O. C.	A*	Complete - Ongoing. Due to outage time requirement, supervisory training programs have been deferred. Supervisor training is an ongoing requirement and refresher training has resumed.
Finding IV-D-4:	Only a fraction of the preventive maintenance routines planned f	or accomp	lishment ar	e complete	ed.
IV-D-4 (c)	Resp: Consider reducing Preventive Maintenance Manager's staff when program stabilizes. Plant Materiel established in 10/82. Their charter is to identify preventive maintenance requirements. Mic, with the acquisition of the maintenance work force, is responsible for accomplishment of identified preventive maintenance. During the 1983 negotiations, the rotating shift concept for the maintenance group was established. Phase I of the implementation program for the rotating shift commences on 5/1/84. Rotating shift concept will provide for maintenance personnel to be available 7 days per week, 24 hours per day, permitting full-time coverage enhancing the availability and timeliness of keeping preventive maintenance procedures and requirements. In addition, the PM program has been reviewed by a GORB subcommittee during the 2nd quarter, 1984.	п.	O. C.	A*	Complete. A review of Plant Materiel (PM) staff has been completed. Due to organizational changes, BETA recommendation is no longer germane. In addition to Preventive Maintenance and Surveillance schedule, the two assigned engineers carry out a number of other functions such as Short Form reviews, NPRDS and NML data collection, vibration analysis and equipment history.

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	COMMENTS
Finding IV-D-5:	Mobile	maintenance is a costly way to perform plant maintenance.				
IV-D-5 (a&b)	Rec:	Consider negotiating agreements with better utilization of Mobile Maintenance. Consider making Mobile Maintenance employees who perform most of their work at Oyster Creek part of M&C Division. M&C Division is taking steps to reduce the number of Mobile Maintenance personnel located at the site. Mobile Maintenance personnel associated with the 1983/1984 Oyster Creek Outage departed the plant premises in the 4th Quarter 1984. M&C Division is working with JCP&L Labor Relations regarding the question of the utilization of Mobile Maintenance personnel at Oyster Creek. Some discussion in the 3rd Quarter 1983 occurred preparatory to the labor negotiations. Additional efforts are proposed for the 1985 labor negotiations. An effective mechanism has been established within GPUN to address this. More current assessment in outage review provides mechanism to follow up. Therefore, this two year item is considered complete.	IV.	M&C	A*	Complete
Finding IV-G:	There is	are too many instances where rad. controls are not as good a sponsibility for high quality rad work performance. Excessi	s they ve gene	should be. ration of r	The work adioactive	force has not accepted enough of waste is part of these problems.
IV-G (b)	Rec: Resp:	Improve Rad Con management and work force management working relationships. Preparation for and initial work during outage have resulted in substantial improvements in working relationships. A Radiation Awareness Committee has been formed and has held routine meetings since 5/20/83. See responses to IV-G(a) and (c). Programs are in place to improve the working relationships; however, additional effort is needed. Rad Awareness Committee has not succeeded but will be reinstituted in January 1985. A report is being prepared with recommended actions for issuance in February 1985 to address this and Item IV-G(f). Recent review of radiation control practices at Oyster Creek provides a more useful current assessment and items to follow up than this two year old recommendation. Item is considered complete.	I.	R&EC 0.C./M&C	A*	Complete

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
IV-G (f)	Rec: Resp:	Look to decrease number of rad. techs. as work force practices good rad. work performance. Will reduce number of Company rad. techs as work practices improve. Unable to reduce due to current level of radiological understanding of workers, supervision and management at Dyster Creek. Recent review of rad. control practices at Dyster Creek provides a more useful current assessment and items to follow up than this two year old recommendation. Item is considered complete.	п.	R&EC	A*	Complete
Finding W-I:	The num	mber of people assigned to administrative work at Oyster Cro	eek appe	ars excessi	ve.	
I-AI	Rec: Resp:	Reduce on-site clerical and administrative positions. (All divisions.) Office of the President set arbitrary number. Operations Analysis completed a study of 25 clerical positions in Oyster Creek Division. The report was issued in November 1984 and most recommendations will be carried out. O/A studies are planned for Oyster Creek based Nuclear Assurance and Rad Con administrative support staff in 1985. We believe that further actions to reduce staff or conduct staff utilization analyses should result from specific requests by the	п.	O/P & Admin.	A*	Ongoing budget reviews and OA program will continue to address.
Finding IV-J-2:	The str	cognizant Division Directors. pres and warshouse function at Dyster Creek can improve its	cupport	of the ola	at.	
IV-J-2 (b)	Rec: Resp:	Carefully plan disposal of on-hand direct turnover material not required for plant support. The Warehouse Reassessment Program, which was initiated in September 1983, has resulted in significant operational improvements within the Oyster Creek warehouse. Support of the warehouse to site operations during the recent Oyster Creek outage is evidence that improvements have been implemented. We recommend this item be closed.	III.	Admin./ 0. C.	A*	Complete !

STATUS COMPENTS	ment, especially with respect to operator	O MAC is making diligent effort to enforce better participation and discipline of its employees during company training programs. OC is working with plant training to achieve more professional student conduct in classrooms and to better control of class- room hours and breaks.
CAT. DIVISION	ining Depart	V. N. A./ All Div.
CAI.	TMI Tra	>
PARAPHRAGED RECOMMENDATION & SUMMARY RESPONSE	There is an overly "understanding" attitude which prevails in the IMI Training Department, especially with respect to operator training.	Make students more responsible for their own performance in training. Each training site has generated documents of student responsibilities when in training. A consolidated student responsibility document has been issued. Monitoring by Management indicates problems have been resolved. A nine volume Operations Plant Manual has been issued at IMI as a basic study guide for all personnel. Senior plant management closely monitor student performance in training and provide individual guidance, counsel, and remedial actions as appropriate. Current instructor training addresses proper conduct by both the instructor and the student. Training and Education has emphasized the instructor's responsibility and the I&E Department's role in the draft of a GPUNC Training Plan, to be published first quarter 1985.
BETA FINDING/ RECOMMEND.	Finding V-8-4:	V-B-4 (c)

COMMENTS			
	ġ.	Complete	Complete
STATUS	is lacki	*	÷
CAI. DIVISION	Jyster Creek	1. 6.	
CAT.	and (Ė	Ė
PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	Technical functions findings & Recommendations Finding VI-A: The overall effectiveness of Technical Functions in supporting TMI-1 and Oyster Creek is lacking.	Review methods to improve the management of the large engineering group within IF. Activities identified in prior responses are continuing, including updating of procedures, examining the experience from Oyster Creek outage and staff training and discussion. Technical Functions implementation of the recommendations of the three study groups (on modification control, budget and financial and administrative and Rad Con practices) is proceeding. Results of the reviews stemming from the Oyster Creek outage experience will be reported to Office of the President on February 4, 1985 with implementation of recommendations following thereafter. Actions have improved effectiveness. Recent Task Forces and outage review provide current meaningful way to track further progress.	Evaluate and procure outside assistance to train if Management in supervising a large engineering group. A program, implemented in cooperation with the Training Department and A. Miller Associates to provide a structured interaction within the Division senior management, is continuing. Interviews have been completed with all groups, information digested, made available to management, and recommendations are being implemented. The thrust of the recommendations involves increased communication and working meetings to resolve any residual inter- and intra-divisional problems to enhance productivity. These activities will be continuing throughout 1985. Recommend item be closed.
\	Functions F	Resp:	Resp:
BETA FINDING/ RECOMPEND.	Finding VI-A:	VI-A (b)	VI-A (c)

BETA FINDING/ STATUS RECOMMEND. PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE CAT. DIVISION CODE COMMENTS Finding VI-F-3: Project engineers do not receive adequate information concerning the progress, cost and trends in progress and cost for the budget activities for which they were the originating source of authority for the modification or the major D&M project. VI-F-3 Rec: Devise reports that will permit having a running III. Admin./ Complete knowledge of cost and performance. 0/P The Business Systems Planning (BSP) study, and two Resp: other committees (Budgeting, Estimating, and Cost Control Committee; and Plant Modification Study Team) have reviewed all systems, practices, etc. The three committees established to review systems, practices and reporting have all completed their studies and have made recommendations, which were accepted by

the O/P and in some instances have been implemented. The implementation of the recommendations, together with the continued enhancements of existing cost reports, should adequately complete this finding.

FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	COMMENTS	
Finding VII-D:	The cost reductions possible with more sophisticated contracting	methods	are not bein	ng achieve	ed.	
VII-D (a)	Rec: Continue training requistioners of materials and services and develop a means to measure success of training. Resp: A number of recent contracts have been awarded which incorporate sophisticated award fee provisions and which shift the risk squarely on the shoulders of the contractors. Increased use of fixed price contracts and competitively awarded blanket purchase orders has also occurred within the past year. Implementation of AMMS has improved our ability to manage this function. Overall Terms and Conditions for contracts have been tightened in ways that benefit the Company. 1985 plans call for the development of an A&E cadre to improve contractor performance and take advantage of volume discounts. Contract administration will be improved as a rating scheme is implemented to allow current performance by a contractor to be a determinant in obtaining future contracts from GPUN. Based upon progress to date, we believe it would be appropriate that this item be closed.	٧.	Admin.	A*	Complete	

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS COOE	CUMMENTS	
Finding VII-E-4:	The $IMI-2$ entrance to the protected area uses a temporary building facility and its operation are inefficient in the use of gu	ing and ma mard manpo	nual search	to control	entry of personnel.	
V:I-E-4	Rec: Upgrade IMI-2 Processing Center including installation of metal monitors and explosive monitors. Offset is reduction in guards at IMI-2. Reso: The construction of a permanent Unit 2 Processing Center to include electronic search equipment has been rejected due to the impending overall status change for IMI-2 that will occur when the core is removed from the reactor. Key carded turnstiles were installed during the 3rd quarter 1984, but the NRC has mandated that three other capital projects be completed before they will allow a reduction in force. These three inter-related projects are funded and scheduled for completion by March 31, 1985 at which time a Physical Security Plan change will be submitted to reduce manning requirements. We recommend this item be considered complete.			A*	Complete	
VII-E-5	Rec: Upgrade perimeter alarm system at IMI has an excessive sec: Upgrade perimeter alarm system to produce a system with a minimum number of false alarms. Resp: Project is underway at IMI, coordinated by Technical Functions. Estimated completion first quarter 1985. We recommend this item be considered complete.	e number	of alarms. Admin.	A*	Complete	-
finding VII-F:	GPUN has no employee who is a medical doctor at headquarters or the GPUN rad. health program. Part time contract physicians and	IMI-1 or a contra	Oyster Creek	k to overse	e medical aspects of e functions.	
VII-F	Rec: Employ a physician at IMI and assign medical radio- logical health responsibilities for IMI-1, IMI-2, and Dyster Creek. Resp: Board of Directors has agreed. Physician was re- cruited and hired 5/14/84. Position vacated 6/13/84. Replacement has been hired. Is expected to report for work at the beginning of the 2nd Quarter 1985.	11.	R&EC	A×	Complete	1

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	COMMENTS
Finding VIII-3:	Produc	tivity at the nuclear plant sites is adversely affected by	current	bargaining	unit emplo	yees.
VIII-3	Rec: Resp:	Conduct review of bargaining agreements to determine impact on work efficiency. Completed for Oyster Creek 4Q'83. Major emphasis has been on enforcing management rights in current agreement. Remains open for IMI and will be addressed prior to the May 1985 negotiations.	IV.	H. R.	A*	Complete. Ongoing. This is a continuing effort but a mechanism within GPUN to identify and address these items is now in place.

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS	
Finding XII-A:	: Insufficient or poor supervision is contributing to poor productivity.						
XII-A (a)	Rec: Resp:	Properly train supervisory personnel. Responses to other recommendations address this problem directly. Revised Supervisory Development Program now complete and being delivered at IMI and Dyster Creek. Initial efforts at Parsippany have begun. The budget and schedule is now in place to achieve 80% completion of the Supervisory Development Program during the third quarter 1985.	٧.	N. A. Gen./OP	A*	Complete	
XII-A (c)	Rec: Resp:	Managers should develop their supervisors by observing them and instructing them. This issue is being addressed in conjunction with the response to Recommendation XII-A-f. New Supervisory Development Program includes management overview and involvement in the development of their subordinate supervisors. This training will be onging and will also be an integral part of the GPUN Management Development process. The budget and schedule in now in place to achieve 80% completion during the fourth quarter 1985 of the Management Overview presentation given in conjunction with the Supervisory Development Program.	٧.	N. A./ Gen.	A*	Complete	
XII-A (j)	Rec: Resp:	Irending of data to ascertain problem areas. A major effort by the Operations Analysis staff is underway to enhance the indices currently reported and to encourage the use of trending within the divisions. Some divisions have already instituted trending programs for key operating parameters. IMI-1, for example, trends budget, job tickets, chemistry analysis, and radiological parameters. Rad Con trends man rems, and radiological incident reports. MAC has a trending program to identify problem areas in its operation. O/A program for indicator development will be ongoing throughout 1985. Inasmuch as trending does not directly impact correcting problems of "insufficient or poor supervision" which is the relevant finding above, we recommend that this item be considered complete. Operations Analysis will continue, however, to use trending programs to assist divisions in analyzing their productivity.	111.	Admin./	A*	Complete Trending Program angoing	

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS	
XII-A (1)	Rec: Resp:	Color-code hard hats at the site to distinguish workers, foremen, officers, contractors. Color coding of hard hats has been revised at Dyster Creek. IMI-1 and O.C. Division Directors have reviewed this item. At IMI-1, the following coding of hard hats is now in place: exempt personnel (white); Bargaining Unit personnel (IBEW) - yellow, Construction contractor personnel have identifying marks on hard hat to indicate their specific trade; Rad Conpersonnel have an insignia on their hard hats for easy identification; and red hard hats are used in RWP areas. No further coding of hard hats is considered necessary or appropriate. Action complete.	IV.	TMI-1/ Gen./0.C.	A*	Complete	
Finding XII-8:	There	is too much paper being generated and distributed throughout	the GPI	JN organizat	ion.		
XII-B (a)	Rec: Resp:	Each division director should help ensure distribution is necessary. A specific effort has been initiated at the officer level to identify and use case studies to exemplify inappropriate distribution of documents. Operations Analysis has completed paperwork reduction studies in five divisions helping them achieve an average of 18.6 percent paperflow reduction. OA plans similar studies in the remaining divisions. At least one year is needed to measure the effectiveness of these efforts. In addition, Administrative Division has established a forms Management function to set up a process for corporate forms generation and distribution. As this item has been incorporated into Divisional/Departmental goals, we recommend this item be considered complete.	ш.	Admin. Gen./OP	A*	Complete	
XII-8 (P)	Rec: Resp:	Departions Analysis has been tasked to conduct a review of the approval and signature requirements on allcuments supportive of GPUNC approval requirements. The review is scheduled for 3rd Q 1985. In addition, review of the drafts of all new corporate policies and procedures specifically seeks to identify instances where signatory authority can be kept at lower levels.	111.	Admin. Gen./OP	A*	Complete Significant progress has been made. Effective mechanism has been established to provide ongoing effort.	

BETA FINDING/ RECOMMEND.		PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS	COMMENTS	
XII-B (e)	Rec: Resp:	Limit required concurrences on documents/procedures. A formal concurrence review procedure to clarify and streamline handling of major corporate documents was implemented in October 1984 company-wide. Also, the "1218" procedure coordinating group will seek to educate employees concerning limiting use of concurrence for corporate procedures. This item should be considered complete.	ш.	Admin.	A*	Complete	
Finding XII-E:	Since the creation of GPUN, too many small groups (ceils or staffs) have been formed to carry out functions which should be handled within the normal functioning groups.						
XII-E	Resp:	Each director review manpower staffing to reduce unnecessary small staff build-ups. Staffing of all Divisions is reviewed as part of budget process. Staff reduction goals of 1-2 percent were established in 1984. Further reductions are planned for 1985. Operations Analysis conducts 4 - 5 staffing studies annually. In addition, Operations Analysis plans to specifically study cell groups throughout GPUN in 1985.	11.	O/P & Admin.	A*	Complete. Ongoing efforts provided by budget reviews and OA program.	