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Waterford 3

W3F1-97-0069  
A4.05  
PR

April 30, 1997

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
Inservice Inspection (ISI) Relief Request ISI-001, Revision 6  
Limited Examination of Welds/Components

Gentlemen:

Enclosed for your review in Attachment 1 is Revision 6 to ISI Relief Request ISI-001. Attachment 1 contains a listing of items (Table 1) that fall into one of two categories: (1) items previously granted relief (e.g., items that have an SER approval date) and (2) items for which Waterford 3 currently seeks relief (e.g., items that do not have an SER approval date). Also enclosed are Attachments 2 through 4 which are provided as aids to clarify the scope of examinations added and deleted.

In accordance with the Code of Federal Regulations 10CFR50.55a(g), "Inservice Inspection Requirements", licensees must perform Inservice Inspection of certain ASME Code Class 1, 2, and 3 pressure-retaining components. The inspection requirements for Waterford 3 SES are contained in the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition with addenda through Winter 1981. Section XI stipulates the amount of examination required for each component.

Whenever complete coverage, as defined by Section XI, is not attainable due to component design or configuration, the limitations to the required examinations must be submitted to the NRC per 10CFR50.55a(g)(5)(iii). In compliance with these regulations, Waterford 3 submitted Relief Request ISI-001, Revision 0, as

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part of the original First Ten Year Interval Inservice Inspection Program at the beginning of this Interval. The information contained in Rev. 0 of this Relief Request was based on the Preservice Examination conducted prior to commercial operation of the plant. As ISI examinations have been performed during the current Interval, the list of components receiving limited or partial examinations has been continually updated. Consequently, Waterford 3 has continued to revise Relief Request ISI-001.

Attachment 1 to this letter is Revision 6 of Relief Request ISI-001 and contains the most current list of Limited Examinations, "Table 1 Limited Examinations." This list has been developed by reviewing all examinations performed during this Interval and contains a listing of all items that did not receive essentially 100% examination coverage. Per Regulatory Guide 1.147, which endorses Code Case N-460, greater than 90% coverage is equivalent to essentially 100% coverage. The items for which Waterford 3 currently seeks relief are those which do not have an NRC SER Approval Date listed.

As an aid to understand the addition and deletion of examinations proposed in this revision of Relief Request ISI-001, we have included Attachments 2 through 4. Attachment 2 lists components for which relief was previously granted by the NRC in Safety Evaluation Report (SER) dated November 8, 1993, but which have been removed from Relief Request ISI-001, Revision 6, based on the following:

1. Components which have received ISI examinations with greater than 90% Code coverage are noted as "inspected @ 100%".
2. Components which have not been selected for examination during this current Interval are noted as "not inspected".
3. Components which are examined as part of an augmented program rather than Section XI are noted as "augmented". Per the SER, relief is not required for non-Section XI examinations. However, the NRC has been informed of the limited examination.
4. Welds that are determined not to exist in the plant are noted as "no weld".
5. Reactor Vessel shell welds have been removed from the list and have been noted as "revoked by 10CFR50.55a(g)(6)(ii)(A)" since these items have been identified in the Code of Federal Regulations and all previous relief has been revoked.

ISI Relief Request ISI-001, Revision 6

W3F1-97-0069

Page 3

April 30, 1997

Attachment 3 lists components that were denied relief by the NRC, as documented in the Safety Evaluation Report dated November 8, 1993, and have been removed from Relief Request ISI-001 Revision 6. Relief was denied due to inadequate information. Examinations were typically described as "partial". Components which have received ISI examinations with greater than 90% Code coverage are noted as "inspected @ 100%". Components which were not selected for examination during the current Interval are noted as "not inspected". Components which have not been examined yet, but are scheduled for examination during RFO8, are noted as "not examined".

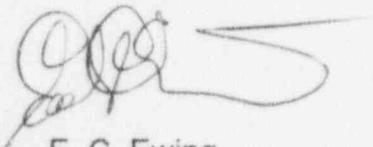
Attachment 4 lists components that were granted relief by the NRC, as documented in the Safety Evaluation Report dated November 8, 1993, but did not receive the Code coverage that was estimated in Revision 5 of the Relief Request. The actual percentage of completion has been added in this Revision of the Relief Request and relief for these items is again being requested for the percent coverage listed.

Even with these changes, the number of examinations performed at Waterford 3 during the current Interval complies with or exceeds the minimum requirements of Section XI.

In summary, Waterford 3 requests relief for all items listed in Attachment 1, Table 1, that do not have an NRC SER approval date. Attachments 2 through 4 are not a part of that relief request. Instead, they are provided to clarify the scope of examinations added or deleted.

If there are any questions, please contact Kevin Hall at (504) 739-6423 or me at (504) 739-6242.

Very truly yours,



E. C. Ewing  
Director  
Nuclear Safety & Regulatory Affairs

ECE/DMU/tjs  
Attachments

ISI Relief Request ISI-001, Revision 6

W3F1-97-0069

Page 4

April 30, 1997

cc: E.W. Merschoff, NRC Region IV  
C.P. Patel, NRC-NRR  
A.L. Garibaldi  
R.B. McGehee  
N.S. Reynolds  
NRC Resident Inspectors Office  
Administrator - LRPD

Attachment 1  
Relief Request ISI-001, Rev. 6

Component Classification

Class 1 and 2, Examination Categories B-A, B-B, B-F, B-J, B-L-2, C-A, C-B, C-C, C-F

Examination Requirement

For each code item requiring a surface or volumetric examination, the examination tables in the Waterford 3 Ten Year Inservice Inspection Program identify a figure which illustrates the examination requirement for a specific code item. These figures were derived from those shown in IWB-2500-1 through 20 and IWC-2500-1 through 13 of Section XI and have been enhanced to show exact weld configuration as it exists at Waterford 3.

Relief Requested

Waterford 3 is requesting that relief be given in reference to obtaining 100% coverage when examining the items contained in Table 1.

Basis for Relief

Class 1 and 2 piping and components are designed with welded joints such as nozzle-to-pipe, pipe-to-elbow and reducer-to-tee which physically obstruct all or part of the required examination. Every effort was made when selecting welds to minimize the number of welds requiring relief. Additionally, multiple angles, search units, extended Vee paths and other techniques (i.e., Refracted L waves) were used to provide additional coverage where practical. To Perform the Code-required examination, modification and/or replacement of the component would be required. The examinations performed on the subject welds in addition to the examination of similar welds contained in the program would detect generic degradation, if it existed, therefore demonstrating an acceptable level of integrity.

Waterford 3 has generated a detailed summary of the ASME Code Class 1 and 2 piping and component welds/areas which received a limited or partial examination. The summary identifies the specific weld/area and the specific cause for the partial examination. The listing of welds receiving a partial exam is attached (Table 1) to this relief request.

Schedule for Implementation

First 10 year Interval

Relief Request ISI-001, Rev. 6  
Table 1 Limited Examinations

Weld/Item Designation	Exam Category	Code Item	Exam Method	Percent Coverage	Description of Limitation	NRC SER Approval Date
04-032	B-B	B2.310	UT	89	Nozzle taper causes 11% loss of coverage for 45° and 60° scans.	
05-011	B-D	B3.110	UT	75	Nozzle configuration causes 25% loss of coverage for 45° and 60° scans.	
05-012	B-D	B3.110	UT	75	Nozzle configuration causes 25% loss of coverage for 45° and 60° scans.	
05-015	B-D	B3.120	UT	70	Nozzle configuration causes 30% loss of coverage for 60° and 70° scan of inner radius.	
05-018	B-D	B3.120	UT	54	Nozzle configuration causes 46% loss of coverage for 60° and 70° scan of inner radius.	
04-010	B-D	B3.130	UT	75	Nozzle configuration prevents scanning from the nozzle side restricting coverage to 75%	
04-011	B-D	B3.130	UT	72	Nozzle configuration restricts coverage to 72%	
04-012	B-D	B3.130	UT	72	Nozzle configuration restricts coverage to 72%	
07-017	B-J	B9.11	UT	43	Nozzle taper and adjacent Weld 07-016 prevent coverage of 57% of weld	
25-029	B-F	B5.40	UT	82	Nozzle configuration restricts coverage to 82%	
26-006	B-F	B5.40	UT	69	Nozzle and elbow configuration restrict coverage to 69%	
09-002	B-J	B9.11	UT	43	Nozzle taper and adjacent Weld 09-001 prevent coverage of 57% of weld	
11-016	B-J	B9.11	UT	52	Loss of transducer contact due to contour of weld prevents coverage of 48% of the required volume	
11-018	B-J	B9.11	UT	88	Loss of transducer contact due to contour of weld prevents coverage of 23% of the required volume	
19-006	B-J	B9.11	UT	75	Valve to pipe configuration limits coverage to one side only	
25-020	B-J	B9.11	UT	87	Elbow radius of curvature prevents examination of 50% of the required volume on the elbow side of the weld	
25-021	B-J	B9.11	UT	87	Tee radius of curvature prevents examination of 50% of the required volume on the tee side of the weld	
25-022	B-J	B9.11	UT	75	Tee radius of curvature prevents examination of the required volume on the elbow side of the weld	
25-030	B-J	B9.11	UT	87	Tee radius of curvature prevents examination of 50% of the required volume on the tee side of the weld	
25-031	B-J	B9.11	UT	87	Reducer taper prevents the axial scan on the reducer side of the weld	
22-023	B-J	B9.11	UT	80	Scanning is partial in the upstream direction due to whip restraint from 16" to 35". Overall loss of coverage is approx. 20%.	
13-002	B-J	B9.11	UT	77	Nozzle taper and adjacent Weld 13-018 prevent coverage of 23% of the required volume	
13-018	B-J	B9.11	UT	85	Adjacent Weld 13-002 and elbow configuration prevent coverage of 15% of weld	
08-008	B-J	B9.31	UT	78	Loss of transducer contact due to contour of nozzle to pipe weld prevents coverage of 22% of the required volume	
12-008	B-J	B9.31	UT	43	Overall loss of coverage is approx. 57%, due to nozzle configuration (nozzle is skewed approx. 45°).	
04-061	C-C	C3.10	MT	85	Approx. 15% loss of coverage due to Steam Generator hydraulic snubber blocking access.	
04-062	C-C	C3.10	MT	85	Approx. 15% loss of coverage due to Steam Generator hydraulic snubber blocking access.	
43-WS-4	C-C	C3.20	MT	50	Approx. 50% loss of coverage due to whip restraint near welded support. Can not be	

Relief Request ISI-001, Rev. 6  
Table 1 Limited Examinations

Weld/Item Designation	Exam Category	Code Item	Exam Method	Percent Coverage	Description of Limitation	NRC SER Approval Date
					adequately cleaned for PT exam due to restraints.	
49-065	C-C	C3.30	PT	64	Approx. 36% loss of coverage due to pump configuration. Weld on bottom of lug could not be examined.	
49-066	C-C	C3.30	PT	64	Approx. 36% loss of coverage due to pump configuration. Weld on bottom of lug could not be examined.	
49-067	C-C	C3.30	PT	64	Approx. 36% loss of coverage due to pump configuration. Weld on bottom of lug could not be examined.	
42-001	C-F	C5.21	UT	65	Approx. 35% loss of coverage due to nozzle-to-reducer configuration.	
56-038	C-F	C5.21	UT	43	Approx. 57% loss of coverage due to valve-to-reducer configuration.	
55-068	C-F	C5.21	UT	43	Approx. 57% loss of coverage due to valve-to-reducer configuration.	
56-068	C-F	C5.21	UT	43	Approx. 57% loss of coverage due to valve-to-reducer configuration.	
55-038	C-F	C5.21	UT	43	Approx. 57% loss of coverage due to valve-to-reducer configuration.	
03-032	B-B	B2.31	UT	Partial	Weld geometry and configuration	6/6/89
04-008	B-B	B2.31	UT	75	3/4-inch instrument nozzles at 21°, 33°, 327°, and 339°; two 24-inch manways at 0° and 112°; nozzle at 180°; and weld 04-009	6/6/89
13-016	B-F	B5.130	UT	Partial	OD mismatch	6/6/89
14-002	B-F	B5.130	UT	Partial	OD mismatch	6/6/89
06-006	B-F	B5.130	UT	90	Nozzle configuration	6/6/89
07-002	B-F	B5.130	UT	Partial	OD mismatch	6/6/89
08-014	B-F	B5.130	UT	65	Weld configuration and adjacent weld	6/6/89
10-002	B-F	B5.130	UT	65	Weld configuration and adjacent weld	6/6/89
11-002	B-F	B5.130	UT	Partial	OD mismatch	6/6/89
12-009	B-F	B5.130	UT	Partial	OD mismatch, shrinkage, and nozzle configuration	6/6/89
12-012	B-F	B5.130	UT	Partial	OD mismatch	6/6/89
25-029	B-F	B5.40	UT	90	Weld crown and nozzle configuration	6/6/89
26-010	B-F	B5.40	UT	90	Nozzle configuration	6/6/89
13-017	B-J	B9.11	UT	Partial	OD mismatch	6/6/89
13-018	B-J	B9.11	UT	70	Downstream direction 45° scan is partial due to O.D. geometry and weld 13-002. Overall loss of coverage is approx. 30%.	6/6/89
21-066	B-J	B9.11	UT	Partial	Weld geometry and configuration	6/6/89
21-068	B-J	B9.11	UT	Partial	Weld geometry and configuration	6/6/89
13-001	B-J	B9.11	UT	3	Nozzle configuration and adjacent weld	6/6/89
14-001	B-J	B9.11	UT	Partial	OD mismatch	6/6/89
07-001	B-J	B9.11	UT	82	OD mismatch and 1-inch nozzle	6/6/89
07-017	B-J	B9.11	UT	65	OD geometry	6/6/89
08-015	B-J	B9.11	UT	65	Weld configuration and adjacent weld	6/6/89
09-001	B-J	B9.11	UT	Partial	OD geometry	6/6/89
10-001	B-J	B9.11	UT	65	Weld configuration and adjacent weld	6/6/89
10-013	B-J	B9.11	UT	Partial	Weld configuration, OD mismatch and support lug	6/6/89
11-001	B-J	B9.11	UT	Partial	OD mismatch, 1-inch line	6/6/89
11-017	B-J	B9.11	UT	3	Nozzle configuration and adjacent weld	6/6/89
12-001	B-J	B9.11	UT	70	Nozzle configuration and support lug	6/6/89

Relief Request ISI-001, Rev. 6  
Table 1 Limited Examinations

Weld/Item Designation	Exam Category	Code Item	Exam Method	Percent Coverage	Description of Limitation	NRC SER Approval Date
12-003	B-J	B9.11	UT	Partial	OD mismatch	6/6/89
08-008	B-J	B9.31	UT	89	Weld configuration	6/6/89
10-007	B-J	B9.31	UT	70	Weld configuration	6/6/89
54-074	C-A	C1.10	UT	Partial	Flange radius and weld geometry	6/6/89
04-026	C-A	C1.10	UT	57	Weld configuration and insulation support ring	6/6/89
04-027	C-A	C1.10	UT	Partial	Insulation pads	6/6/89
04-029	C-A	C1.20	UT	Partial	Instrument nozzles at 40°, 80°, 120°, 160°, 200°, 280°, 320°, 360°	6/6/89
54-075	C-A	C1.30	UT	Partial	Flange radius and weld geometry	6/6/89
62-078	C-F	C5.11	UT	50	Weld configuration	6/6/89
62-089	C-F	C5.11	UT	50	Weld configuration	6/6/89
41-020	C-F	C5.21	UT	80	Weld geometry and penetration	6/6/89
41-022	C-F	C5.21	UT	65	Weld geometry	6/6/89
43-079	C-F	C5.21	UT	70	Weld configuration	6/6/89
43-082	C-F	C5.21	UT	70	Weld configuration	6/6/89
51-018-900	C-F	C5.21	UT	Partial	Weld configuration and geometry	6/6/89
52-019-900	C-F	C5.21	UT	Partial	Weld configuration and geometry	6/6/89
55-040	C-F	C5.21	UT	85	Weld geometry and adjacent drain line	6/6/89
55-051	C-F	C5.21	UT	70	Weld configuration	6/6/89
55-066	C-F	C5.21	UT	Partial	Weld configuration and geometry	6/6/89
55-070	C-F	C5.21	UT	Partial	Adjacent drain line	6/6/89
55-075	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
55-078	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
56-040	C-F	C5.21	UT	15	Weld configuration and geometry	6/6/89
56-047	C-F	C5.21	UT	80	Weld geometry and penetration	6/6/89
56-050	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
56-090	C-F	C5.21	UT	Partial	Weld configuration and geometry	6/6/89
41-001	C-F	C5.21	UT	85	Weld configuration	6/6/89
43-001	C-F	C5.21	UT	Partial	Adjacent pipe	6/6/89
51-004	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
51-009	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
52-004	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
52-009	C-F	C5.21	UT	Partial	Weld configuration	6/6/89
43-005LA	C-F	C5.22	UT	5	Approx. 5% coverage for all 45° scans due to 2 whip restraint bars (4" wide) which cross the weld.	6/6/89
02-010	B-A	B1.11	UT	0	Weld completely inaccessible due to shroud covering entire weld length	11/8/93
02-002	B-A	B1.21	UT	24	Six-inch wide lifting lugs at 15°, 75°, 105°, and 345°; and the shroud	11/8/93
02-003	B-A	B1.21	UT	24	Six-inch wide lifting lugs at 15°, 75°, 105°, and 345°; and the shroud	11/8/93
02-004	B-A	B1.22	UT	30	Six-inch wide lifting lugs at 165°, 195°, 255°, and 285°; shroud; and adjacent weld 02-001	11/8/93
02-005	B-A	B1.22	UT	30	Six-inch wide lifting lugs at 165°, 195°, 255°, and 285°; shroud; and adjacent weld 02-001	11/8/93
02-001	B-A	B1.40	PT UT	Partial 50	Six-inch wide lifting lugs at 15°, 45°, 75°, 105°, 135°, 165°, 195°, 225°, 285°, 315°, and 345°; shroud 8 inches from the toe of the weld on one side; and the flange 5 inches from the toe on	11/8/93

Relief Request ISI-001, Rev. 6  
Table 1 Limited Examinations

Weld/Item Designation	Exam Category	Code Item	Exam Method	Percent Coverage	Description of Limitation	NRC SER Approval Date
					the other side	
03-002	B-B	B2.31	UT	27	Base support configuration 3/4-inch instrument nozzles at 21°, 33°, 327° and 339°	11/8/93
04-002	B-B	B2.31	UT	27	Base support configuration	11/8/93
03-005	B-B	B2.32	UT	87	Nozzle configuration	11/8/93
03-007	B-B	B2.32	UT	82	Manway nozzle configuration and adjacent 1-inch instrument line	11/8/93
04-009	B-B	B2.40	UT	65	Weld configuration and adjacent welds 04-009 and 04-024	11/8/93
01-027	B-D	B3.100	UT	73	Core barrel and nozzle taper	11/8/93
01-030	B-D	B3.100	UT	68	Core barrel and nozzle taper	11/8/93
17-017	B-J	B9.11	UT	90	OD geometry	11/8/93
09-016	B-F	B5.130	UT	65	Weld configuration and adjacent weld	11/8/93
13-018	B-J	B9.11	UT	Partial	OD geometry	11/8/93
17-030	B-J	B9.11	UT	64	Weld geometry and configuration	11/8/93
18-022	B-J	B9.11	UT	50	Weld configuration	11/8/93
18-027	B-J	B9.11	UT	50	Weld configuration	11/8/93
22-023	B-J	B9.11	MT UT	Partial Partial	Whip restraint	11/8/93
09-002	B-J	B9.11	UT	90	OD geometry	11/8/93
09-008	B-J	B9.11	UT	Partial	Weld geometry	11/8/93
09-017	B-J	B9.11	UT	65	Weld configuration and adjacent weld	11/8/93
11-016	B-J	B9.11	UT	90	OD geometry	11/8/93
11-018	B-J	B9.11	UT	90	OD geometry	11/8/93
09-019LB	B-J	B9.12	UT	<50	OD geometry	11/8/93
09-020LA	B-J	B9.12	UT	<50	OD geometry	11/8/93
51-033	C-F	C5.11	UT	25	Weld configuration	11/8/93
52-027	C-F	C5.11	UT	25	Weld configuration	11/8/93
52-066	C-F	C5.11	UT	43	Weld configuration	11/8/93
51-005	C-F	C5.11	UT	25	Component configuration	11/8/93
52-005	C-F	C5.11	UT	25	Weld configuration	11/8/93
43-049LA	C-F	C5.22	UT	84	Adjacent whip restraints	11/8/93

The following table is a list of components that were granted relief by the Nuclear Regulatory Commission as documented in Safety Evaluation Report dated November 8, 1993, but are removed from the ISI Relief Request ISI-001 revision 6.

COMPONENT #	REASON UNLISTED
01-008	revoked by 10 CFR 50.55a(g)(6)(ii)(A)
01-012	revoked by 10 CFR 50.55a(g)(6)(ii)(A)
04-011	inspected @100%
04-012	inspected @100%
04-024	inspected @100%
04-025	inspected @100%
04-028	inspected @100%
04-032	inspected @100%
05-002	inspected @100%
05-003	inspected @100%
07-010	not selected
07-019LA	inspected @100%
07-020LB	inspected @100%
09-019LA	inspected @100%
10-009	not selected
10-012	inspected @100%
11-010	not selected
11-019LA	inspected @100%
12-002	inspected @100%
13-019LB	inspected @100%
13-020LB	inspected @100%
17-016	not selected
17-032	inspected @100%
18-025	not selected
18-059	inspected @100%
19-026	not selected
19-027	not selected
19-055	inspected @100%
20-016	not selected
20-025	not selected
20-029	inspected @100%
20-056	not selected
20-056	not selected
22-053	not selected
22-053	not selected

25-009	inspected @100%
25-015	inspected @100%
25-024	inspected @100%
25-025	no weld
25-026	inspected @100%
25-027	inspected @100%
25-028	inspected @100%
25-028	inspected @100%
26-002	inspected @100%
26-003	not selected
26-006	inspected @100%
26-007	inspected @100%
26-008	inspected @100%
26-009	inspected @100%
42-001	inspected @100%
42-005	inspected @100%
42-011	inspected @100%
42-024	inspected @100%
43-004	inspected @100%
43-089	augmented
44-026LA	inspected @100%
44-086LA	inspected @100%
44-089	inspected @100%
45-019	inspected @100%
46-021	inspected @100%
47-034	augmented
50-023	inspected @100%
51-003	inspected @100%
55-042	inspected @100%
56-042	inspected @100%
56-070	inspected @100%
56-072	inspected @100%
60-098	augmented
60-131	augmented
61-051	inspected @100%
61-071	inspected @100%
61-073	inspected @100%
61-080	inspected @100%
62-047	inspected @100%
62-094	inspected @100%

The following table is a list of components that were denied relief by the Nuclear Regulatory Commission as documented in Safety Evaluation Report dated November 8, 1993, and are not listed in ISI Relief Request ISI-001 revision 6

COMPONENT #	REASON UNLISTED
06-005	not selected
07-018	inspected @100%
09-008	not selected
09-018	inspected @100%
11-020LB	inspected @100%
13-008	not selected
15-007	not selected
16-001	inspected @100%
16-002	inspected @100%
16-003	inspected @100%
16-006	inspected @100%
16-007	inspected @100%
16-008	inspected @100%
16-011	inspected @100%
16-016	inspected @100%
17-003	inspected @100%
17-014	not selected
17-023	not selected
18-008	not selected
18-042	not selected
19-002	not selected
19-008	not examined (scheduled for next outage- April 97)
19-024	not selected
19-038	not selected
19-042	not selected
22-004	not selected

The following table is a list of components that were granted relief by the Nuclear Regulatory Commission as documented in Safety Evaluation Report dated November 8, 1993, and did not receive the coverage that was estimated in ISI Relief Request ISI-001 revision 6:

COMPONENT #	% estimated	% actual
04-011	91	72
04-012	91	72
07-017	65	43
08-008	89	78
09-002	90	43
11-016	90	52
11-018	90	88
25-029	90	82
26-006	93	69
42-001	90	65