CONNECTICUT YANKEE ATOMIC POWER COMPANY HAZARDOUS WASTE MANAGEMENT PROCEDURE

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Spill Prevention Control and Countermeasure Plan

HWM 15.1-7

Rev. 4

VERIFY MOST RECENT REVISION AGAINST MDI:

INITIALS	DATE
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Approval:	Vice President DE	By sector - Had	dam Neck Sta	nion
PORC Mtg. N	0: 97-16	_/Date:_	2-13-	97
Effective Date	219	-97		

Level of Use Information

9806240187 980611 PER ADOCK 05000213 S PDR Responsible Individual: Carl A. Charest

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ACP 1.2-6.5B, Original

CHANGES TO HWM 15.1-7, Spill Prevention and Countermeasure Plan

- Page 1 0f 15: add <u>REVIEW DATE</u> of "7/14/97" add <u>PERFORMED BY</u> "P. Brindamour"
- Page 3 of 15: added certification by Jeffery Bibby, Registered Proffessional Engineer
- Page 4 of 15: change Review by: from "Gunti G. Goncarovs" to "Scott R. Herd"
- Page 5 of 15: change A. to read:

"April 25, 1997

Approximately 1/2 gallon of oil spilled from a malfunctioning truck engine onto the site access road. It flowed to a nearby storm drain which led to the pond. Oil booms placed at the mouth of the drain and pads placed onto the initial spill area collected the oil, which was disposed of.*

Page 10 of 15: under STEP, list:

- i "Annual Review"
- 2 "Page 3"
- 3 Page 4
- 4 "Page 5"

Page 10 of 15: under CHANGE, list:

i "Added"

- 2 "P.E. Certification"
- 3 "Changed named"
- 4 Added description of
 - oil spill"

Page 10 of 15: under REASON, list

| "Performed by P. Brindamour"

2 "Required: 40 CFR 112"

3 Different Chemistry

Manager

4 "Required: 40 CFR 112"

ANNUAL REVIEW

FEB1 9 1997 HWM 15.1-REV. 4

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Inspections conducted per EPD 6.07, "Audit of Compliance with SPCC Regulations"

REVIEW DATE	PERFORMED BY	REVIEW DATE	PERFORMED BY
7/30/84	M. D. Quinn	10/23/90	S. R. Matthess
11/12/84	M. D. Quinn	4/3/92	G. Goncarovs
7/5/85	S. R. Matthess	4/4/93	C. A. Charest
8/27/86	S. R. Matthess .	6/1/94	C. A. Charest
8/1/87	S. R. Matthess	10/23/95	C. A. Charest
4/4/88	S. R. Matthess	12/12/96	C. A. Charest
10/23/89	S. R. Matthess		

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC, May 1991, Rev. 5)

FEB1 1 1997 HWM 15.1-REV. 4

CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK STATION

This plan describes the procedures adopted to prevent the discharge of oil into the navigable waters of the United States, as required by 40 CFR Part 112, Environmental Protection Agency, Oil Pollution Prevention, non-transportation related onshore and offshore facilities.

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CERTIFICATION

RE: Connecticut Yankee Atomic Power Company Haddam Neck Plant

I hereby certify that in accordance with 40 CFR Section 112.3(d), I have examined the facility named above, that I am familiar with the provisions of 40 CFR Part 112, and that this plan has been prepared in accordance with good engineering practices.

SIGNED:

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Jebby I. Bibby

Jeffrey F. Bibby, PE

Registered Professional Engineer, State of Connecticut



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HWM 15.1-7 REV. 4

Date: 7/14/97

GENERAL

The Connecticut Yankee plant is located in the Town of Haddam on the East Bank of the Connecticut River.

The reactor is a pressurized light water moderated and cooled system.

The 616.2 MW turbine is a tandem compound unit. It includes a double flow, high pressure turbine and two double flow low pressure turbines.

The individual responsible for oil spill prevention and control is the Chemistry Manager.

Review by:

Gunti G. Goncarovs

Date

HWM 15.1-7 REV. 4

A. PREVIOUS OIL SPILL EVENTS IN THE PERIOD 1/11/73 - 11/19/96

March 28, 1973

The #2B emergency diesel generator fuel oil day tank overflowed when an operator left the tank unattended while filling, spilling approximately 1500 gallons of #2 fuel oil to the floor of the diesel room and through floor drains into #2 unit discharge tunnel. #2 discharge canal was not in service, consequently, the oil did not flow out of the tunnel but remained within the plant. (DID NOT ENTER NAVIGABLE WATERS)

HWM 15.1-7

June 27, 1973

#2 emergency diesel generator fuel oil day tank overflowed spilling approximately 70 gallons of #2 diesel fuel oil to the floor of the diesel room and through floor drains into #2 unit discharge tunnel. The oil remained within the plant. (DID NOT ENTER NAVIGABLE WATERS)

November 19, 1996

A one gallon volume mixture of water and #2 diesel fuel oil was mistakenly disposed of in an unlabeled boiler room equipment drain. It entered the discharge tunnel, but was contained before entering the discharge canal, was reported to State and Federal Agencies, and was cleaned up using oil-absorbent booms. (DID NOT ENTER NAVIGABLE WATERS)

B. CORRECTIVE ACTION TAKEN (Prior to Certification)

- Changed the diesel day tank high level alarm to sound in Control Room at any time a high level exists.
- Extended the diesel day tank overflow pipe and tied into the underground tank vents so that any overflow would go back in the respective 5000 gallon storage tank.
- Replaced the manual switch with a push button which must be held in to operate the fuel oil transfer pump.
- Installed automatic suction priming for emergency diesel fuel oil transfer pumps to ensure automatic operation of the pump without operator attendance.
- Placed a slick bar across discharge canal.
- Stored slick bar at discharge canal outfall in the event of an oil spill.
- Built wall around the 42,000 gallon diesel oil storage tank transfer pumps.
- Plugged floor drains to discharge canal around all oil storage tanks and equipment with large oil reservoir.
- Labeled all floor drains in the boiler room. Checked all drains within the protected area to ensure that they were properly labeled to prevent unauthorized discharges.

C. POTENTIAL FOR EQUIPMENT FAILURE

Experience at Connecticut Yankee indicates that with the addition of the corrective action stated above, there is reasonable assurance that equipment failure will not occur.

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D. OIL SPILL CONTINGENCY PLAN

1. This plan includes the action to be taken in the event of an oil spill and lists the equipment available for use in such an emergency. (See Appendix B).

A copy is available on site for inspection by appropriate authorities.

E. CONTAINMENT STRUCTURES

1. DIKES

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- a. The #2 fuel oil storage tank is surrounded by an earthen dike which is lined with an impermeable barrier.
- b. The #2 fuel oil storage tank transfer pumps are surrounded on 3 sides by a concrete wall, and are mounted on a concrete slab sealed into the berm area.
- A dike constructed of steel surrounds the turbine lube oil tank and lube oil purifier.
- d. The oil storage room is enclosed on four sides by concrete block and a steel barrier has been installed around the oil storage room entrance doors and ventilation vents.
- e. A dike surrounding the spare power transformer drains to a sump, which pumps over to a 27,000 gallon holding tank.
- f. The emergency shutdown risk diesel generator (EG-7) has an 800 gallon concrete containment incorporated below it's structural foundation to contain a fuel oil leak. Stormwater is released manually after inspection by the Chemistry Department.

F. CONFORMANCE WITH APPLICABLE GUIDELINES

- 1. FACILITY DRAINAGE
 - a. Drainage from diked areas
 - Drainage from the 42,000 #2 fuel oil storage tank diked area is returned by locked closed drain valve. Should it be necessary to open this valve, prior inspection will be made to ensure that no oil will be allowed to discharge.

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In-Plant Drainage

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- Drainage from the hydrogen seal oil system is to the condensate pit and will be pumped back to the oil storage room sump.
- Drainage from the oil room sump under manual control to an outdoor hose connection to a tank truck. A capped isolation valve is located upstream of the hose connection. The hose connection is capped off when not in use.
- 3. Drainage from the 2,000 gallon used oil tank is by manual control to a tank truck. An isolation valve is located upstream of the hose connection. The hose connection is capped off when not in use. All tanks are equipped with an overflow back to the oil room sump.
- All floor drains around equipment where oil leakage is possible have been plugged, or are routed to the turbine hall floor sump collection system.

Oil Storage Tanks Located Within the Plant

- One 10,000 gallon turbine lubricating oil reservoir with high level alarm and visual indicator.
- Two 12,500 gallon lubricating oil storage tanks with visual indicators.
- One 2,000 gallon used oil storage tank equipped with a visual level indicator. One turbine lube oil purifier.
- 4. Two 500 gallon diesel oil day tanks equipped with level indicators and high level alarm. Two 5,000 gallon diesel oil underground storage tanks equipped with high level alarm and visual indicators.
- One above ground 42,000 gallon storage tank equipped with visual indicator.
- One 275 gallon diesel driven fire pump storage tank equipped with visual indicator.
- 7. One 500 gallon Maintenance Department diesel oil tank (portable).
- 8. One 275 gallon Security System Diesel Oil Tank.
- Two 500 gallon diesel oil tanks used in the Health Physics/Chemistry Storage Building.
- 10. One 1000 gallon diesel tank in the EOF.
- 11. 6,000 gallon underground unleaded gasoline tank.
- Drum storage in waste oil/hazardous storage area (Est. 50 drums).

13. Drum storage in new lube oil storeroom (Est. 50 drums).

14. 4,000 gallon diesel fuel oil (#2 Kerosene) heating oil tank.

- d. Other Oil Containing Equipment
 - Electrical Equipment containing oil located outside is as follows:

Main Power Transformer 319	26,830 gallons
Station Service Station Transformer 199	4,900 gallons
Station Service Station Transformer :/89	4,900 gallons
Station Service Station Transformer .309	2,785 gallons
389 and 399 Tie Breaker	1,680 gallons
SPARE Station Service Station Transformer	2,554 gallons
SPARE Power Transformer	13,333 gallons
SPARE Power Transformer OCB	
(three @)	73 gallons
SPARE Power Step Up Transformer	510 gallons

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e. Facility Transfer Equipment

1. The fill piping for #2 fuel oil is above ground.

The #2 fuel oil piping between the 42,000 gallon storage and plant is underground.

- The fill pipe connection for the turbine lube oil storage tank is above ground.
- 3. The discharge pipe connection for used oil is above ground.

All fill and pipe connections are capped when not in use and have a closed isolation valve.

The turbine lube oil cooler drain valves, turbine lube oil tank drain valve and lube oil storage tanks drain valves are locked closed.

The fill valves are closed when not in use.

There is no above ground oil piping that would be in the path of vehicular traffic around the site.

f. Facility for Tank Truck Unloading

- The tank loading facility located outside the turbine building for the turbine oil storage tanks is a three inch line to the top of each tank.
- The tank truck loading facility for the #2 fuel oil storage tank is inside a diked area.

Normally there are one or two personnel in attendance at all times fuel unloading is in progress.

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G. OTHER SPILL PREVENTION AND CONTAINMENT PROCEDURES

Procedure HWM 15.1-2, "Connecticut Yankee Hazardcaus Waste Contingency Plans", has been issued to establish a mechanism by which oil and chemical spills are promptly reported to the appropriate governmental agencies. This procedure also addresses spill cleanup procedures.

H. INSPECTION AND RECORDS

An SPCC review shall be made annually, signed, dated by the person performing the inspection, approved by the Chemistry Manager and countersigned by a Director. Inspection records will be retained with the station copy of the SPCC.

SPCC plant inspections shall be conducted weekly by Chemistry for the waste oil room and stores for the warehouse. Nuclear Systems Operators obtain readings each shift in the yard for level and general equipment status, also they inspect the fuel oil tanks and pumps.

I. SECURITY

The plant complex is enclosed by a continuous security fence and gates are kept closed and locked. Entrance is through a vehicular gate and guardhouse which is manned continuously. The plant is attended 24 hours per day, every day of the year.

- The main flow drain valves, and other valves that would permit direct outward flow of the tanks contents are closed and either locked or blanked with flanges or plugs.
- The unloading connections of the oil pipelines are valves such that the valves can be closed and capped by blank flanges or plugs.
- Except in an extreme case or emergency, unloading of fuel takes place during daylight hours.

J. PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

Station operating personnel are instructed in spill prevention and containment procedures as part of their normal operating requirements. Appendices B and C are the special procedures utilized for this purpose. Annual General Employee training will review salient points of the SPCC with station personnel.

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K. SUMMARY OF CHANGES

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STEP	CHANGE	REASON
Annual Review	Added.	Performed by C. Charest.
General	Changed named.	Diffe.ent Chemistry Manager.
Page 4, Section A	Added.	Had a spill on 11/19/96.
Page 4, Section B	Added.	Chemist feedback
Page 5, Section E	Added E.1.f.	Chemist feedback
Appendix A	Added.	Chemist feedback.

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APPENDICES

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- A. Preventive Measures
- B. Containing and Cleanup of Oil Spills

C. Site Plan

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D. Tank Inspection Record

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K. SUMMARY OF CHANGES

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STEP	CHANGE	REASON
Annual Review	Added.	Performed by C. Charest.
General	Changed named.	Different Chemistry Manager.
Page 4, Section A	Added.	Had a spill on 11/19/96.
Page 4, Section B	Added.	Chemist feedback
Page 5, Section E	Added E.1.f.	Chemist feedback.
Appendix A	Added.	Chemist feedback.

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APPENDICES

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- A. Preventive Measures
- B. Containing and Cleanup of Oil Spills
- C. Site Plan

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D. Tank Inspection Record

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APPENDIX A

PREVENTIVE MEASURES

Changes carried out in order to reduce the possibility of oil spill events.

- Erected a barrier around turbine lube oil tank, lube oil purifier and seal off lube oil storage room. This enclosed barrier will be sufficient to contain the total volume of the turbine lube oil tank, the two turbine oil storage tanks and the used oil storage tank.
- The Chemistry Manager will maintain viable SPCC program and will ensure familiarity of the program with the station staff through annual retraining and written procedures.
- Administrative procedures ADM 1.1-76, "Reporting Oil and Chemical Spills", and ADM 1.1-86, "Chemical Spills", have been approved by the Station Vice President.
- 4. The turbine hall floor sump collection system has been modified such that all fluids are diverted to a 15,000 gallon holding tank.
- 5. A transformer oil collection tank has been installed on the West bank of the discharge canal. Purpose is to collect rain water and runoff from the spare transformer area prior to sampling and discharge to the canal, preventing transformer oil discharge.
- Hazardous Waste Management Procedure HWM 15.1-2, "Connecticut Yankee Hazardous Waste Contingency Plan" has been written to supersede ADM 1.1-76 and ADM 1.1-86 as noted above in Step 3.
- 7. The 42000 gallon fuel oil storage tank bermed area has been enlarged to hold 110% of the tank capacity. An impermeable barrier has been installed in the berm. The transfer pumps are mounted on a concrete cap which is sealed into the berm liner. Four monitoring wells ring the tank and are sampled on a monthly bases.
- Labeled Boiler room floor drains, warning personnel not to dispose of anything in them.

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APPENDIX B

CONTAINING AND CLEANUP OF OIL SPILLS

1.0 PURPOSE

The purpose of this procedure is to provide instructions for containing and cleanup of oil spills.

- 2.0 APPLICABILITY
 - 2.1 This procedure applies to personnel called to respond to an oil spill.
 - 3.0 REFERENCES
 - 3.1 HWM 15.1-2, "Connecticut Yankee Hazardous Waste Contingency Plan".

JX 2/13/57

- 4.0 PREREOUISITES
 - 4.1 None
- 5.0 PRECAUTIONS
 - 5.1 When dealing with an oil spill, all efforts should be made to protect the environment.

6.0 PROCEDURE

- 6.1 Refer to HWM 15.1-2 to implement this procedure.
- 6.2 Notify Duty Officer and refer to HWM 15.1-2.
- 6.3 For small spills surround area with absorbent such as speedy dry and wipe up spill with rags, paper or other absorbent material. A spill cabinet is located opposite the diked area.
- 6.4 For large oil spills that threaten to contaminate the surrounding water, place the slick bar stored in box on West bank of Discharge Canal across the discharge canal to prevent oil from spreading.
- 6.5 Conduct immediate search for source of spill and secure to limit amount of spillage.
- 6.6 Use Spill Control Equipment stored in the Storeroom for larger spills.



APPENDIX D

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TANK INSPECTION RECORD

(see Tank Inventory Control Coordinator in the Environmental Programs Department) ATTACEMENT C

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ANALYTICAL RESULTS



Northeast Utilities Service Company Environmental, Health & Safety Services

NU Environmental Laboratory Millstone Nuclear Power Station Rope Ferry Road Waterford, CT 06385-0128 (860) 444-4238

April 23, 1998

Dear Paul,

On April 14, 1998, I was asked by CY staff to inspect and evaluate foaming observed in the discharge canal above the booms across the weir. I arrived at the discharge site at approximately 12:30 p.m. and observed a small area of patchy foam (<1 cm thick) surrounded by a light surface film. This accumulated material was primarily restricted to the waters between the sheet pile bulkhead that extend about 10-15 m directly in front of the discharge. The foam was light beige in color and resembled that commonly observed in moving freshwater such as streams and wave-swept lake shores. There was no observable irridescent sheen usually associated with a petroleum product spill. I collected a sample of the foam and took it to Northeast Utilities Environmental Laboratory (NUEL) for more detailed evaluation. At NUEL, this sample was examined under a compound microscope, which revealed a number of live microorganisms including rotifers, ciliates and diatoms, along with fragments of organic material from plant detritus. No observable source of the foam was noted in the sample, which is not surprising given that dissolved organic material from natural sources is typically responsible for such surface foaming in natural waters. It is my professional judgement that these natural biologcal sources are likely the cause of the foam in the CY discharge. Should you have any further questions, please let me know.

Sincerely,

John T. Swencuters

John T. Swenarton Scientist Northeast Utilities Environmental Laboratory PO Box 128 - Millstone Station Waterford, CT 06385



ENVIRONMENTAL SCIENCE CORPORATION

Great River Center, 362 Industrial Park Road Middletown, CT 06457, (860) 632-0600 FAX (860) 632-7743 Web Site: www.esc-lab.com

April 21, 1998

Ms. Pat Zabrocki CT Yankee Atomic Power Company 362 Injun Hollow Road East Hampton, CT 06424

RE: ESC # 9804000169 CY INTAKE

Dear Ms. Zabrocki:

Enclosed please find the results of analysis for 2 samples received at Environmental Science Corporation on April 14, 1998. The analyses associated with these samples include:

8015B Diesel Range Organics by GC/FID

Should you have any questions regarding the enclosed material, or require additional information, please contact Client Services at (860) 632-0600.

Sincerely,

ule of Gross

Kyle F. Gross Laboratory Director

cc: Ed Keith



Project Narrative ESC# 9804000169

The following samples have been reviewed for accuracy and completeness. Any comments associated with your sample results are outlined below.

CY Intake 201

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CY Discharge201



ENVIRONMENTAL SCIENCE CORPORATION

Great River Center, 362 Industrial Park Road Middletown, CT 06457, (860) 632-0600 FAX (860) 632-7743 Web Site: www.esc-lab.com

Client: CT Yankee Atomic Power Company Ms. Pat Zabrocki

Project Name: CY INTAKE

Project Number: N/A

Sample Prep Information

Lab Report Number: 9804000169

Purchase Order #: 017800

Date Received: 04/14/98

Contract Number: N/A

Prep	Client Sample ID	ESC Sample ID	Date Sampled	Matrix	Prepped	Analyst	Hold (mail
DRO (A)	CY Intake 201	51268	04/13/98	Aqueous Grab	04/17/98 13:00	JS	14 DAY
	CY Discharge201	51269	04/13/98	Aqueous Grab	04/17/98 13:00	JS	14 DAY

04/21/98

Date Reported

le to Gross

Laboratory Director

CT Certification No. PH-0476, MA Certification No. M-CT013, NH Certification No. 222495, RJ License No. 195, EPA Number CT013



ENVIRONMENTAL SCIENCE CORPORATION

Great River Center, 362 Industrial Park Road Middletown, CT 06457, (860) 632-0600 FAX (860) 632-7743 Web Site: www.esc-lab.com

Client:

CT Yankee Atomic Power Company Ms. Pat Zabrocki

Lab Report Nu	mber: 9804000169
Purchase Order	#: 017800
Date Received:	04/14/98
Contract Num	ber: N/A

Project Name: CY INTAKE

Project Number:N/A

Client Sample ID:	CY Intake 201	CY Discharge201	
ESC Sample ID:	51268	51269	
Location: Matrix: Date Sampled: ** TEST ** Units:	Aqueous Grab 04/13/98 mg/L	Aqueous Grab 04/13/98 mg/L	
Date Analyzed :	04/20/98	04/20/98	
Time Analyzed :	20:24	21:17	
Analyst:	AP	AP	
8015B Diesel Range	Organics by GC/FID		
## Dilution Factor ##	1.0000	1.0000	
Diesel Related Organics	< 100	< 100	

<- Below Practical Quantitation Limit N/A - Not Applicable Soils analyzed on dry weight basis. **-Surrogate

le d. Gross

Laboratory Director

04/21/98

Date Reported

CT Certification No. PH-0476, MA Certification No. M-CT013, NH Certification No. 222495, RI License No. 195, EPA Number CT013





CT YANKEE INTAKE 9804000169

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*** Environmental Science Corporation *** *** METHOD DRO ***

DATE: 04/20/98

	-			
	QC.	SUMMARY	REPUR	

COMPOUND	MATRIX	UNITS	TRUE VALUE	LCS	LCSD	RPD
#2 fuel	SOIL	mg/kg	100	27	18	40

*** METHOD BLANK SUMMARY ***

COMPOUND	MATRIX	UNITS	RESULT
#2 fuel	SOIL	mg/kg	< 100

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