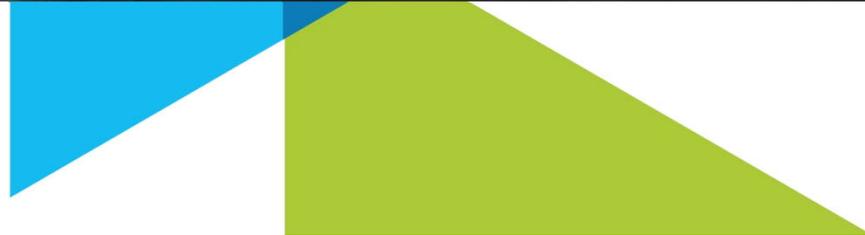
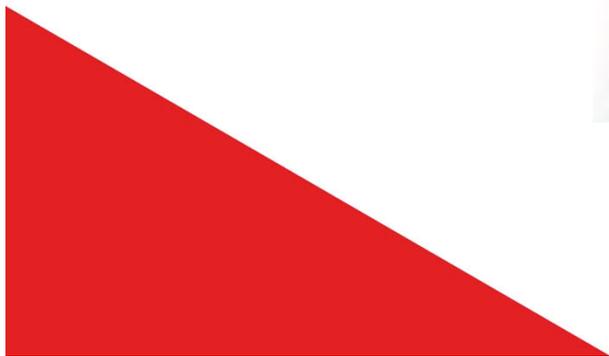




Southern Nuclear

Vogtle Pre-Submittal Meeting to Revise Technical Specification 3.3.1 & 3.3.2 Allowable Values

August 13, 2021





Meeting Purpose and Agenda

- The purpose for this meeting is to discuss the proposed amendment request to revise Technical Specification Tables 3.3.1-1 and 3.3.2-1 Allowable Values
- This meeting will cover the following topics:
 - Background on the updated instrument uncertainty calculations for the Vogtle Units 1 & 2 Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) trip functions
 - Proposed License Amendment Request
 - Milestones

Background on updated instrument uncertainty calculations for the Vogtle Units 1 & 2 Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) trip functions



Background

- Instrument uncertainty calculations for the Vogtle Units 1 & 2 Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) trip functions have been updated.
- Calculation inputs have been updated to account for component/equipment replacement, operating experience (OE), and vendor communications.
- No change to the nominal trip setpoints (NTS).
- No impact to the safety analyses of record (AOR) or safety analysis limits (SAL).
- Updated uncertainty calculations for the RTS and ESFAS result in changes to the Allowable Values (AVs) contained in Technical Specifications (TS) Tables 3.3.1-1 and 3.3.2-1.



Applicable Safety Analysis Discussion

- In addition to the RTS and ESFAS uncertainties, the uncertainties used in the Revised Thermal Design Procedure (RTDP) analyses were also re-calculated based on the updated inputs used in the RTS and ESFAS trip function uncertainty calculations.
- Parameters are pressurizer pressure, primary coolant temperature (T_{avg}), reactor power, and Reactor Coolant System (RCS) flow.
- Analysis of Record (AOR) are either consistent with or more conservative than the revised RTDP analyses uncertainty values.
- Updated RTDP uncertainty values will be implemented under 10 CFR 50.59 as a change to the UFSAR.



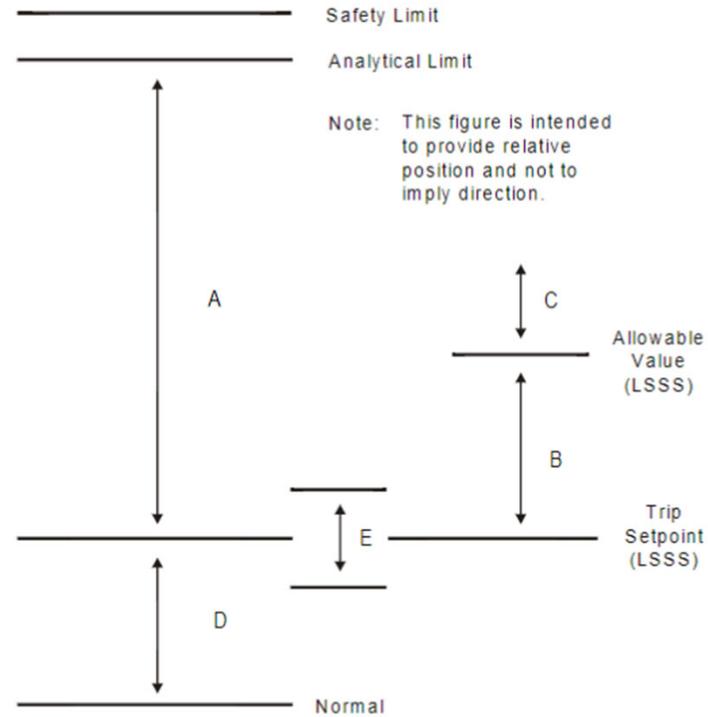
Setpoint Analysis

- NTS in conjunction with the use of as-found and as-left tolerances, together with the requirements of the AV ensure that SLs are not violated during Anticipated Operational Occurrences (AOOs) and that the consequences of Design Basis Accidents (DBAs) will be acceptable.
- NTS are determined from the Analytical Limits in UFSAR Chapters 6 and 15.
- NTS separation from the Analytical Limit is based on a combination of all errors.
- Reactor Protection and ESF actuation function AV provided in TS are limiting values that allow for deviation of the "as found" setting from the NTS during calibration.
- Updated AVs have been calculated using previously NRC approved setpoint methodology for Vogtle 1&2.
- AVs serves as the as-found TS OPERABILITY limit for the purpose of the Channel Operational Test (COT).
- The NTS and AV relationship is shown graphically on the next slide.



Setpoint Analysis

Setpoint relationships of nuclear safety related setpoints from Regulatory Guide 1.105, revision 3 and ISA 67.04 - 1994



Note: This figure is intended to provide relative position and not to imply direction.

- A. Allowance described in paragraph 4.3.1
- B. Allowance described in paragraph 4.3.1
- C. Region where channel may be determined inoperable
- D. Plant operating margin
- E. Region of calibration tolerance (acceptable as left condition) described in paragraph 4.3.1

The background consists of several overlapping, semi-transparent gray geometric shapes, including triangles and rectangles, creating a layered, abstract effect. The text is centered over these shapes.

Proposed License Amendment Request



Proposed License Amendment Request

- SNC proposes to change the Technical Specifications to revise specified Allowable Values (AVs) contained in Tables 3.3.1-1 and 3.3.2-1.
- The revised AV were determined from the Nominal Trip Setpoint using the method in the following example:

Pressurizer Pressure P-11 Permissive AV

- Nominal Trip Setpoint = 2000 psig
 - Rack Calibration Accuracy = 0.5% span
 - Pressurizer Pressure Span = 800 psi
 - Allowable Value \leq NTS + RCA * (Span)
 - Allowable Value \leq 2000 psig + 0.5% span * (800 psi) < 2004 psig
- The revised AVs would move closer to the NTS values.
- TS Bases 3.3.1 Reference 6 and Bases 3.3.2 Reference 7 (WCAP-11269, Westinghouse Setpoint Methodology for Protection Systems Vogtle Station) would be replaced by WCAP-16969, Westinghouse Setpoint Methodology for Protection Systems Vogtle Electric Generating Plant - Units 1&2.

TS Table 3.3.1-1 Summary of AV Changes



Table 3.3.1-1 RTS Functions	Current AV	Revised AV	NTS Value
2.a. Power Range Neutron Flux High	≤ 111.3% RTP	≤ 109.3% RTP	109% RTP
2.b. Power Range Neutron Flux Low	≤ 27.3% RTP	≤ 25.3% RTP	25% RTP
3. Power Range Neutron Flux High Positive Rate	≤ 6.3% RTP with time constant ≥ 2 sec	≤ 5.4% RTP with time constant ≥ 2 sec	5% RTP with time constant ≥ 2 sec
4. Intermediate Range Neutron Flux	≤ 41.9% RTP	≤ 26.2% RTP	25% RTP
5. Source Range Neutron Flux	≤ 1.7 E5 cps	≤ 1.04 E5 cps	1.0 E5 cps
8.a. Pressurizer Pressure Low	≥ 1950 psig	≥ 1958 psig	1960 psig
8.b. Pressurizer Pressure High	≤ 2395 psig	≤ 2389 psig	2385 psig
9. Pressurizer Water Level – High	≤ 93.9%	≤ 92.5%	92%
10.a. Reactor Coolant Flow – Low (Single Loop)	≥ 89.4%	≥ 89.6%	90%
10.b. Reactor Coolant Flow – Low (Two Loops)	≥ 89.4%	≥ 89.6%	90%
13. Steam Generator (SG) Water Level – Low-Low	≥ 35.9%	≥ 37.3%	37.8%
14.a. Turbine Trip: Low Fluid Oil Pressure	≥ 500 psig	≥ 570 psig	580 psig
16.a. RTS Interlock: Intermediate Range Neutron Flux, P-6	≥ 1.2 E-5% RTP	≥ 1.91 E-5% RTP	2.0 E-5% RTP
16.c. RTS Interlock: Power Range Neutron Flux, P-8	≤ 50.3% RTP	≤ 48.3% RTP	48% RTP
16.d. RTS Interlock: Power Range Neutron Flux, P-9	≤ 40.6% RTP	≤ 40.3% RTP	40% RTP
16.e. RTS Interlock: Power Range Neutron Flux (footnote l), P-10 input to P-7	≤ 12.3% RTP	≤ 10.3% RTP	10% RTP
16.e. RTS Interlock: Power Range Neutron Flux (footnote m), P-10	≥ 7.7% RTP	≥ 9.7% RTP	10% RTP
16.f. RTS Interlock: Turbine Impulse Pressure, P-13	≤ 12.3%	≤ 10.5%	10%



Table 3.3.1-1 RTS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
1. Manual Reactor Trip	1,2	2	B	SR 3.3.1.13	NA	NA
	3(a), 4(a), 5(a)	2	C	SR 3.3.1.13	NA	NA
2. Power Range Neutron Flux						
a. High	1,2	4	D	SR 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)} SR 3.3.1.15	≤ 111.3% RTP ≤ 109.3% RTP	109% RTP
b. Low	1(b),2	4	E	SR 3.3.1.1 SR 3.3.1.8 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)} SR 3.3.1.15	≤ 27.3% RTP ≤ 25.3% RTP	5% RTP
3. Power Range Neutron Flux High Positive Rate	1,2	4	E	SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)} SR 3.3.1.15	≤ 6.3% RTP ≤ 5.4% RTP with time constant ≥ 2 sec	5% RTP with time constant ≥ 2 sec
4. Intermediate Range Neutron Flux	1(b), 2(c)	2	F,G	SR 3.3.1.1 SR 3.3.1.8 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)}	≤ 41.9% RTP ≤ 26.2% RTP	25% RTP
	2(d)	2	H	SR 3.3.1.1 SR 3.3.1.8 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)}	≤ 41.9% RTP ≤ 26.2% RTP	25% RTP



Table 3.3.1-1 RTS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
5. Source Range Neutron Flux	2(d)	2	I,J	SR 3.3.1.1 SR 3.3.1.8 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)}	≤ 1.7 E5 <u>≤ 1.04 E5</u> cps	1.0 E5 cps
	3(a), 4(a), 5(a)	2	J,K	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.11 ^{(n)(o)}	≤ 1.7 E5 <u>≤ 1.04 E5</u> cps	1.0 E5 cps
	3(e), 4(e), 5(e)	1	L	SR 3.3.1.1 SR 3.3.1.11 ^{(n)(o)}	NA	NA



Table 3.3.1-1 RTS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
8. Pressurizer Pressure						
a. Low	1 ^(f)	4	M	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 1960 psig ≥ 1958 psig	1960 ^(g) psig
b. High	1,2	4	E	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≤ 2395 psig ≤ 2389 psig	2385 psig
9. Pressurizer Water Level - High	1 ^(f)	3	M	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)}	≤ 93.9% ≤ 92.5%	92%
10. Reactor Coolant Flow - Low						
a. Single Loop	1 ^(h)	3 per loop	N	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 89.4% ≥ 92.5%	90%
b. Two Loops	1 ⁽ⁱ⁾	3 per loop	M	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 89.4% ≥ 89.6%	90%



Table 3.3.1-1 RTS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
11. Undervoltage RCPs	1(f)	2 per bus	M	SR 3.3.1.9 SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 9481 V	9600 V
12. Underfrequency RCPs	1(f)	2 per bus	M	SR 3.3.1.9 SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 57.1 Hz	57.3 Hz
13. Steam Generator (SG) Water Level - Low Low	1,2	4 per SG	E	SR 3.3.1.1 SR 3.3.1.7 ^{(n)(o)} SR 3.3.1.10 ^{(n)(o)} SR 3.3.1.15	≥ 35.9% <u>≥ 37.3%</u>	37.8%

Table 3.3.1-1 RTS Functions



FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
14. Turbine Trip						
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 ^{(l)(p)} SR 3.3.1.16	≥ 500 psig ≥ 570 psig	580 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.14	≥ 90% open	96.7% open
15. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	Q	SR 3.3.1.13	NA	NA
16. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(d)	2	R	SR 3.3.1.11 SR 3.3.1.12	≥ 4.2E-5% RTP ≥ 1.91 E-5% RTP	2.0E-5% RTP
b. Low Power Reactor Trips Block, P-7	1	1 per train	S	SR 3.3.1.5	NA	NA
c. Power Range Neutron Flux, P-8	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 50.3% RTP ≤ 48.3% RTP	48% RTP
d. Power Range Neutron Flux, P-9	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 40.6% RTP ≤ 40.3% RTP	40% RTP
e. Power Range Neutron Flux, P-10 and input to P-7	1,2	4	R	SR 3.3.1.11 SR 3.3.1.12	(l,m)	(l,m)
f. Turbine Impulse Pressure, P-13	1	2	S	SR 3.3.1.10 SR 3.3.1.12	≤ 42-410.5% Impulse Pressure Equivalent turbine	10% Impulse Pressure Equivalent turbine

(continued)

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.
(j) Above the P-9 (Power Range Neutron Flux) interlock.
(l) For the P-10 input to P-7, the Allowable Value is ~~≤ 42-310.3%~~ RTP and the Nominal Trip Setpoint is 10% RTP.
(m) For the Power Range Neutron Flux, P-10, the Allowable Value is ~~≥ 7-79.7%~~ RTP and the Nominal Trip Setpoint is 10% RTP.



TS Table 3.3.2-1 Summary of AV Changes

Table 3.3.2-1 ESFAS Functions	Current AV	Revised AV	NTS Value
1.c. Safety Injection: Containment Pressure – High 1	≤ 4.4 psig	≤ 4.2 psig	3.8 psig
1.d. Safety Injection: Pressurizer Pressure – Low	≥ 1856 psig	≥ 1866 psig	1870 psig
1.e. Safety Injection: Steam Line Pressure – Low	≥ 570 psig	≥ 581.8 psig	585 psig
2.c. Containment Spray: Containment Pressure High – 3	≤ 22.4 psig	≤ 21.9 psig	21.5 psig
4.c. Steam Line Isolation: Containment Pressure High – 2	≤ 15.4 psig	≤ 14.9 psig	14.5 psig
4.d.(1) Steam Line Isolation: Steam Line Pressure – Low	≥ 570 psig	≥ 581.8 psig	585 psig
4.d.(2) Steam Line Isolation: Steam Line Pressure Negative Rate – High	≤ 125 psi/sec	≤ 103.3 psi/sec	100 psi/sec
5.b. Turbine Trip and Feedwater Isolation: Low Reactor Coolant System (RCS) T_{avg}	≥ 561.5°F	≥ 563.8°F	564°F
6.b. Auxiliary Feedwater: Steam Generator (SG) Water Level – Low-Low	≥ 35.9%	≥ 37.3%	37.8%
7.b. Semi-Automatic Switchover to Containment Sump: Refueling Water Storage Tank (RWST) Level – Low-Low	≤ 216.6 in and ≥ 210.4 in	≤ 216.5 in and ≥ 210.4 in	213.5 in
8.b. ESFAS Interlocks: Pressurizer Pressure, P-11	≤ 2010 psig	≤ 2004 psig	2000 psig



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
1. Safety Injection						
a. Manual Initiation	1,2,3,4	2	B	SR 3.3.2.6	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2	C	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
c. Containment Pressure - High 1	1,2,3	3	D	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≤ 4.4 psig <u>≤ 4.2 psig</u>	3.8 psig
d. Pressurizer Pressure - Low	1,2,3(a)	4	D	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≥ 1856 psig <u>≥ 1866 psig</u>	1870 psig
e. Steam Line Pressure - Low	1,2,3(a)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≥ 570^(b) psig <u>≥ 581.8^(b) psig</u>	585 ^(b) psig



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
2. Containment Spray						
a. Manual Initiation	1,2,3,4	2	B	SR 3.3.2.6	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2	C	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
c. Containment Pressure						
High - 3	1,2,3	4	E	SR 3.3.2.1 SR 3.3.2.4 ⁽ⁱ⁾ SR 3.3.2.7 ⁽ⁱ⁾ SR 3.3.2.8	≤ 22.4 psig ≤ 21.9 psig	21.5 psig



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
4. Steam Line Isolation (continued)						
c. Containment Pressure - High 2	1,2(c), 3(c)	3	D	SR 3.3.2.1 SR 3.3.2.4 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.7 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.8	≤ 15.4 psig ≤ 14.9 psig	14.5 psig
d. Steam Line Pressure						
(1) Low	1,2(c), 3(a)(c)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.4 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.7 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.8	≥ 570. (b) psig ≥ 581.8 (b) psig	585 (b) psig
(2) Negative Rate - High	3(d)(c)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.4 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.7 ⁽ⁱ⁾⁽ⁱ⁾ SR 3.3.2.8	≤ 125 (e) ≤ 103.3 (e) psi/sec	100 (e) psi/sec



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
5. Turbine Trip and Feedwater Isolation						
a. Automatic Actuation Logic and Actuation Relays	1,2(f)	2 trains	H	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
b. Low RCS T _{avg}	1,2(f)	4	I	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾	≥ 561.6 °F <u>≥ 563.8 °F</u>	564 °F
	Coincident with Reactor Trip, P-4	Refer to Function 8a for all P-4 requirements.				
c. SG Water Level-High High (P-14)	1,2(f)	4 per SG	I	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≤ 82.5%	82.0%
d. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
6. Auxiliary Feedwater						
a. Automatic Actuation Logic and Actuation Relays	1,2,3	2 trains	G	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
b. SG Water Level-Low Low	1,2,3	4 per SG	D	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≥ 35.0% <u>≥ 37.3%</u>	37.8%



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
6. Auxiliary Feedwater (continued)						
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
d. Trip of all Main Feedwater Pumps	1,2(g)	1 per pump	J	SR 3.3.2.6	NA	NA
7. Semi-automatic Switchover to Containment Sump						
a. Automatic Actuation Logic and Actuation Relays	1,2,3,4(h)	2	C	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
b. Refueling Water Storage Tank (RWST) Level-Low Low ^(j)	1,2,3,4	4	K	SR 3.3.2.1 SR 3.3.2.4 ⁽⁰⁰⁾ SR 3.3.2.7 ⁽⁰⁰⁾ SR 3.3.2.8	≤ 216.6 in. ≤ 216.5 in. and ≥ 210.4 in. ≥ 210.4 in.	213.5 in.
Coincident with Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					



Table 3.3.2-1 ESFAS Functions

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
8. ESFAS Interlocks						
a. Reactor Trip, P-4	1,2,3	1 per train, 2 trains	F	SR 3.3.2.9	NA	NA
b. Pressurizer Pressure, P-11	1,2,3	3	L	SR 3.3.2.4 SR 3.3.2.7	≤ 2010 psig ≤ 2004 psig	2000 psig



Milestones



Milestones

- Submit LAR by end of 3Q2021
- Request NRC approval within twelve months
- Implement within 90 days of NRC approval



Questions?