



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 8, 2021

Mr. G. T. Powell
President and Chief Executive Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT NOS. 223 AND 208 TO REVISE TECHNICAL SPECIFICATION 3.6.3 AND TO REMOVE THE TECHNICAL SPECIFICATIONS INDEX (EPID L-2021-LLA-0041)

Dear Mr. Powell:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 223 to Renewed Facility Operating License No. NPF-76 and Amendment No. 208 to Renewed Facility Operating License No. NPF-80 for the South Texas Project, Units 1 and 2, respectively. The amendments consist of changes to the technical specifications (TSs) in response to your application dated March 11, 2021.

The amendments revise the TSs by adding a note to Limiting Condition for Operation 3.6.3 allowing for containment penetration flow paths to be unisolated intermittently under administrative controls. Additionally, the proposed change will remove the Index from the Technical Specifications and place them under licensee control.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Dennis J. Galvin, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:

1. Amendment No. 223 to NPF-76
2. Amendment No. 208 to NPF-80
3. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-498

SOUTH TEXAS PROJECT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 223
Renewed License No. NPF-76

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by STP Nuclear Operating Company (STPNOC)*, acting on behalf of itself and for NRG South Texas LP, the City Public Service Board of San Antonio (CPS), and the City of Austin, Texas (COA) (the licensees), dated March 11, 2021, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*STPNOC is authorized to act for NRG South Texas LP, the City Public Service Board of San Antonio, and the City of Austin, Texas, and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-76 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 223, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-76 and
the Technical Specifications

Date of Issuance: December 8, 2021



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

STP NUCLEAR OPERATING COMPANY

DOCKET NO. 50-499

SOUTH TEXAS PROJECT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 208
Renewed License No. NPF-80

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by STP Nuclear Operating Company (STPNOC)*, acting on behalf of itself and for NRG South Texas LP, the City Public Service Board of San Antonio (CPS), and the City of Austin, Texas (COA) (the licensees), dated March 11, 2021, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*STPNOC is authorized to act for NRG South Texas LP, the City Public Service Board of San Antonio, and the City of Austin, Texas, and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-80 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 208 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-80 and
the Technical Specifications

Date of Issuance: December 8, 2021

ATTACHMENT TO LICENSE AMENDMENT NOS. 223 AND 208 TO
RENEWED FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80
SOUTH TEXAS PROJECT, UNITS 1 AND 2
DOCKET NOS. 50-498 AND 50-499

Replace the following pages of the Renewed Facility Operating License Nos. NPF-76 and NPF-80 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License No. NPF-76

REMOVE
- 4 -

INSERT
- 4 -

Renewed Facility Operating License No. NPF-80

REMOVE
- 4 -

INSERT
- 4 -

Technical Specifications

<u>REMOVE</u>	<u>INSERT</u>	<u>REMOVE</u>	<u>INSERT</u>
Index Cover Page	---	xi	---
i	---	xii	---
ii	---	xiii	---
iii	---	xiv	---
iv	---	xv	---
v	---	xvi	---
vi	---	xvii	---
vii	---	xvii a	---
viii	---	xviii	---
ix	---	xix	---
x	---	3/4 6-17	3/4 6-17

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 223 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Not Used

(4) Initial Startup Test Program (Section 14, SER)*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

(5) Safety Parameter Display System (Section 18, SSER No. 4)*

Before startup after the first refueling outage, HL&P^[**] shall perform the necessary activities, provide acceptable responses, and implement all proposed corrective actions related to issues as described in Section 18.2 of SER Supplement 4.

(6) Supplementary Containment Purge Isolation (Section 11.5, SSER No. 4)*

HL&P shall provide, prior to startup from the first refueling outage, control room indication of the normal and supplemental containment purge sample line isolation valve position.

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

** The original licensee authorized to possess, use and operate the facility was HL&P. Consequently, historical references to certain obligations of HL&P remain in the license conditions.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 208 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. STPNOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Not Used

(4) Initial Startup Test Program (Section 14. SR)*

Any changes to the Initial Test Program described in Section 14 of the Final Safety Analysis Report made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

(5) License Transfer

Texas Genco, LP shall provide decommissioning funding assurance, to be held in decommissioning trusts for South Texas Project, Unit 2 (Unit 2) upon the direct transfer of the Unit 2 license to Texas Genco, LP, in an amount equal to or greater than the balance in the Unit 2 decommissioning trust immediately prior to the transfer. In addition, Texas Genco, LP shall ensure that all contractual arrangements referred to in the application for approval of the transfer of the Unit 2 license to Texas Genco, LP to obtain necessary decommissioning funds for Unit 2 through a non-bypassable charge are executed and will be maintained until the decommissioning trusts are fully funded, or shall ensure that other mechanisms that provide equivalent assurance of decommissioning funding in accordance with the Commission's regulations are maintained.

(6) License Transfer

The master decommissioning trust agreement for Unit 2, at the time the direct transfer of Unit 2 to Texas Genco, LP is effected and thereafter, is subject to the following:

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 The containment isolation valves shall be OPERABLE with isolation times less than or equal to the required isolation times.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation barrier⁽²⁾ OPERABLE in each affected penetration that is open and within 24 hours:

- a. Restore the inoperable valve(s) to OPERABLE status, or
- b. Isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolation position, or check valve with flow through the valve secured⁽¹⁾⁽³⁾, or
- c. Isolate each affected penetration by use of at least one closed manual valve or blind flange⁽¹⁾, or
- d. Apply the requirements of the CRMP.

Otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 The isolation valves shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test, and verification of isolation time.

4.6.3.2 Each isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at a frequency in accordance with the Surveillance Frequency Control Program by:

- a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" isolation valve actuates to its isolation position;
- b. Verifying that on a Containment Ventilation Isolation test signal, each purge and exhaust valve actuates to its isolation position; and
- c. Verifying that on a Phase "B" Isolation test signal, each Phase "B" isolation valve actuates to its isolation position.
- d. Verifying that on a Phase "A" Isolation test signal, coincident with a low charging header pressure signal, that each seal injection valve actuates to its isolation position.

4.6.3.3 The isolation time of each power-operated or automatic valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

⁽¹⁾ Penetration flow paths (except for Containment Purge flow paths) may be unisolated intermittently under administrative controls.

⁽²⁾ An isolation barrier may either be a closed system (i.e., General Design Criteria 57 penetrations) or an isolation valve.

⁽³⁾ A check valve may not be used to isolate an affected penetration flow path in which more than one isolation valve is inoperable or in which the isolation barrier is a closed system with a single isolation valve (i.e., General Design Criteria 57 penetration)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 223 AND 208 TO

RENEWED FACILITY OPERATING LICENSE NOS. NPF-76 AND NPF-80

STP NUCLEAR OPERATING COMPANY, ET AL.

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

1.0 INTRODUCTION

By letter dated March 11, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21070A429), the STP Nuclear Operating Company (STPNOC, the licensee), submitted a license amendment request (LAR) to the U.S. Nuclear Regulatory Commission (NRC, the Commission) for the South Texas Project, Units 1 and 2 (STP). The proposed changes would modify the STP Technical Specifications (TSs) by adding a note to Limiting Condition for Operation (LCO) 3.6.3 to allow for containment penetration flow paths to be unisolated intermittently under administrative controls. Additionally, the proposed change would remove the Index from the TSs and place it under licensee control.

2.0 REGULATORY EVALUATION

2.1 System Description

The containment isolation valves ensure that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a loss-of-coolant accident.

2.2 Proposed Changes to the TSs

The licensee proposed to add a footnote to TS LCO 3.6.3, which states, "Penetration flow paths (except for the Containment Purge flow paths) may be unisolated intermittently under administrative controls." The purpose of the footnote is to allow the licensee flexibility in the performance of maintenance and testing evolutions. The licensee stated that administrative controls will be maintained to ensure that any penetration open, per the footnote, can be rapidly isolated, if required. The administrative controls would be described in the TS Bases. The licensee also stated that the containment purge penetrations cannot be opened under

administrative controls. In addition, the footnotes to LCO 3.6.3 would be changed to include numbers instead of using asterisks as designations.

The licensee also proposed to remove the Index from the TSs. This is an administrative nontechnical change.

2.3 Applicable Regulatory Requirements and Guidance

The NRC staff evaluated the impact of the proposed changes as they relate to regulations and regulatory guidance.

2.3.1 Regulatory Requirements

The NRC staff's evaluation is based upon the following regulations:

- Section 50.36(a)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR) requires an applicant for an operating license to include in the application proposed TSs in accordance with the requirements of 10 CFR 50.36, "Technical specifications," and include a summary statement of the bases or reasons for such specifications, other than those covering administrative controls. However, per 10 CFR 50.36(a)(1), these TS bases "shall not become part of the technical specifications."
- Section 50.36(c) of 10 CFR requires that TSs include certain items. Per 10 CFR 50.36(c)(2)(i), the TSs must include LCOs, which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. That provision also requires that when an LCO of a nuclear reactor is not met, the licensee must shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met.

2.3.2 Regulatory Guidance

The addition of a note to allow penetration flow paths to be unisolated intermittently under administrative controls is addressed by the NRC staff guidance in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications," dated May 6, 1991, and is also included in the Standard Technical Specifications (STS) in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12100A222 and ML12100A228, respectively).

The NRC staff also considered NUREG-0800, Revision 3, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Chapter 16.0, "Technical Specifications," dated March 2010 (ADAMS Accession No. ML100351425), for its review of this LAR, which provides guidance on review of TSs.

3.0 TECHNICAL EVALUATION

3.1 Addition of Footnote to LCO 3.6.3 to Allow Intermittent Unisolation of Penetration Flow Paths

The addition of the footnote to LCO 3.6.3 would allow intermittent unisolation of containment penetration flow paths. The proposed footnote states that this action would be taken under

administrative controls. The footnote is consistent with the guidance in GL 91-08, which provides the following example: "Locked or sealed closed valves may be opened on an intermittent basis under administrative control." The proposed footnote would apply only to LCO 3.6.3, Actions b and c. Action b requires isolation of the affected penetration by use of at least one deactivated automatic valve secured in the isolation position, or check valve with the flow through the valve secured. Action c requires the isolation of affected penetrations by use of at least one manual valve or blind flange. Based on the applicability of the footnote only to Actions b and c, it can only be used under the conditions considered in GL 91-08. Section 50.36(c)(2)(i) of 10 CFR requires TSs to contain LCOs, and that the licensee take remedial actions as required by the TSs. The proposed change would modify the TS required actions by allowing unisolation of penetration pathways under specified conditions. The conditions adopted by the proposed change are in accordance with the NRC staff guidance in GL 91-08. Therefore, the proposed change is consistent with 10 CFR 50.36(c)(2)(i).

Due to the large pathways in the purge penetrations and the direct communication between the containment and the outside atmosphere, the licensee stated that the purge valves, including the supplementary purge valves, are not allowed to be opened under administrative controls. These valves have a separate LCO 3.6.1.7, to which the footnote does not apply.

The STS LCO 3.6.3 in NUREG-1431, includes a note that allows penetration flow paths to be unisolated intermittently under administrative controls. The administrative controls described in the STS Bases are consistent with GL 91-08 and those adopted by the licensee. Therefore, the proposed change is consistent with STS in NUREG-1431.

The licensee stated that the TS Bases will be revised to include administrative controls to be taken when flowpaths are unisolated. Acceptable administrative controls are provided in GL 91-08. The considerations from GL 91-08 are: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close the valve in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valve and that this action will prevent the release of radioactivity outside the containment. The licensee provided a markup of the Bases pages. The bases markup is consistent with the guidance from GL 91-08, and additionally includes direction that the containment purge flow paths are excepted from unisolating under administrative controls. Section 50.36(a)(1) of 10 CFR provides requirements for TS Bases.

The proposed change results in a total of three footnotes to LCO 3.6.3. LCO 3.6.3 currently has two footnotes that are designated using single and double asterisks. The proposed change would eliminate the asterisks and would designate the footnotes using numbers (i.e., 1, 2, and 3). This is an administrative change that has no effect on the use of the TS.

The addition of the footnote would allow flexibility in testing and maintenance activities without any significant decrease in safety. The administrative controls, as described in the Bases, would ensure that the penetration can be rapidly isolated if a need for containment isolation is indicated.

The NRC staff finds the addition of the footnote to allow intermittent unisolation of penetration flowpaths under administrative controls acceptable. The finding is based on the licensee's implementation of the change consistent with the NRC staff guidance in GL 91-08, its consistency with the STS in NUREG-1431, and the fact that the footnote does not apply to the purge penetration flowpaths. As applicable, the NRC staff verified the consistency between the plant system design, the considerations in GL 91-08, and the assumptions regarding design in

the STS. The NRC staff reviewed the proposed bases changes and found them consistent with guidance and the STS Bases in NUREG-1431. Finally, the NRC staff concluded that the proposed changes to the identification scheme for the footnotes is editorial in nature and does not affect the implementation of the TS.

3.2 Removal of the Technical Specification Index

The Index specifies where specific TS sections can be found but does not contain any technical or other information required by 10 CFR 50.36. Since the Index does not include information designated for inclusion in the TS by 10 CFR 50.36, it may be removed. Removal of the Index from the TS constitutes an administrative change and has no effect on the use or implementation of the TS, and is therefore acceptable.

3.3 Summary and Conclusion

The NRC staff has reviewed the proposed changes to ensure that the TS will continue to provide reasonable assurance of adequate safety with respect to intermittent unisolation of penetration flowpaths under administrative controls. The changes are consistent with NRC staff guidance and include adequate detail so that plant personnel can implement the actions as intended. The changes also include minor administrative revisions that have no material effect on the TS.

As described above, the removal of the Index from the TSs is an administrative change that does not affect the implementation of the TSs and is acceptable.

Therefore, the NRC staff finds that the proposed TS changes are technically acceptable, and that the TS, as revised, will continue to meet the requirements of 10 CFR 50.36.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Texas State official was notified of the proposed issuance of the amendment on November 15, 2021. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission previously issued a proposed finding that the amendments involve no significant hazards consideration published in the *Federal Register* on May 18, 2021 (86 FR 26955), and there has been no public comment on such finding. Accordingly, the 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 or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: R. Hernandez, NRR
S. Smith, NRR

Date: December 8, 2021

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT NOS. 223 AND 208 TO REVISE TECHNICAL SPECIFICATION 3.6.3 AND TO REMOVE THE TECHNICAL SPECIFICATIONS INDEX (EPID L-2021-LLA-0041) DATED DECEMBER 8, 2021

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OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NRR/DSS/STSB/BC(A)
NAME	DGalvin	PBlechman	NJordan
DATE	11/19/2021	11/18/2021	10/23/2021
OFFICE	NRR/DSS/SCP/BC	OGC / NLO*	NRR/DORL/LPL4/BC
NAME	BWittick	MCarpentier	JDixon-Herrity
DATE	10/25/2021	12/6/2021	12/7/2021
OFFICE	NRR/DORL/LPL4/PM		
NAME	DGalvin		
DATE	12/8/2021		

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