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HDI PNP 2023-013

Technical Specification 6.6.2

April 12, 2023

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Big Rock Point  
Docket No. 50-155 and 72-043  
Facility Operating License No. DPR-6

Subject: 2022 Radiological Environmental Operating Report

In accordance with the requirements of Big Rock Point (BRP) Defueled Technical Specifications Section 6.6.2, Annual Radiological Environmental Operating Report, Holtec Decommissioning International, LLC (HDI) on behalf of Holtec Palisades, LLC (Holtec Palisades) is submitting the 2022 Radiological Environmental Operating Report for the BRP Independent Spent Fuel Storage Installation (ISFSI). The report was prepared in accordance with the requirements of 10 CFR 50, Appendix I, Section IV.B. The period covered by the enclosed report is January 1, 2022, through December 31, 2022.

This letter contains no new and no revised regulatory commitments.

Should you have any questions or require additional information, please contact Jim Miksa, Regulatory Assurance Engineer at (269) 764-2945.

Respectfully,

**Jean A. Fleming**

Digitally signed by Jean A.  
Fleming  
Date: 2023.04.12 07:53:04 -04'00'

Jean A. Fleming  
Vice President, of Licensing, Regulatory Affairs & PSA  
Holtec International

Enclosure: Big Rock Point 2022 Radiological Environmental Operating Report

- Attachments:
1. Sample Collection Anomalies
  2. Environmental Sample Schedule and Sample Location Maps
  3. Radiological Environmental Monitoring Program Data for BRP ISFSI

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cc: NRC Region III Regional Administrator  
NRC Decommissioning Inspector – Big Rock Point  
NRC NMSS Project Manager – Big Rock Point

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Enclosure  
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Enclosure to  
HDI PNP 2023-013  
Big Rock Point  
2022 Radiological Environmental Operating Report

## Big Rock Point 2022 Radiological Environmental Operating Report

### I. Introduction

The 2022 Big Rock Point (BRP) Annual Radiological Environmental Operating Report provides a summary and data interpretation of the BRP Radiological Environmental Monitoring Program (REMP) as conducted during the 2022 reporting period. Reporting requirements are detailed in the BRP Defueled Technical Specification 6.6.2 and Offsite Dose Calculation Manual (ODCM).

The BRP ODCM contains the requirements for the REMP. The radiological environmental monitoring sampling requirements are greatly reduced from the plant's operating period and now only encompass Independent Spent Fuel Storage Installation (ISFSI) operations.

All samples were collected during the monitoring period with no anomalies.

Tables 1, 2, and 3 of this enclosure, provide a summary of 2022 BRP REMP sample requirements and results.

### II. Discussion and Interpretation of Results

#### A. Thermoluminescent Dosimeter (TLDs) – Gamma Dose

The BRP Gamma Dose Assessment Program consists of eleven TLD locations: Four at the outside perimeter of the ISFSI (locations: BR-18, BR-19, BR-20, and BR-21), four at the ISFSI protected area fence line (locations: BR-22, BR-23, BR-24, and BR-25), and three control TLDs, approximately 13 miles out (locations: BR-5 Petoskey, BR-6 Boyne City, and BR-7 Ironton). These are the only TLDs required for ISFSI operation. The additional locations are no longer applicable because they no longer exist.

Environmental gamma doses are measured quarterly by placement of one TLD badge per designated location. Detailed sample station identification and location information is provided in Attachment 2.

For 2022, the average quarterly gamma readings were:

14.5 millirem for protected area fence TLDs,  
12.7 millirem for ISFSI outside perimeter TLDs, and  
13.0 millirem for the control TLD locations.

The comparative evaluation of the protected area fence, the ISFSI outside perimeter, and the control TLDs are all slightly less than that of 2020. All values are within the statistical standard deviation.

A comparative evaluation was also completed of the 2021 offsite control TLD data to the ISFSI outside perimeter TLD data. There was excellent correlation between the off-site control TLDs and the ISFSI outside perimeter TLDs. There was no significant difference between the 2021 and 2022 control data.

Each TLD badge contains a 4-chip TLD that meets ANSI N545-1975 requirements.

B. Air Samples

The BRP REMP no longer requires that airborne surveillance be conducted.

C. Milk

The BRP REMP no longer requires that milk samples be collected.

D. Lake Water

The BRP REMP no longer requires that lake water samples be collected.

E. Drinking Water

The BRP REMP no longer requires that drinking water samples be collected.

F. Crops

The collection of food crops/vegetation is not required by the BRP REMP.

G. Sediment

The BRP REMP no longer requires that well water samples be collected.

H. Aquatic Biota

The collection of aquatic biota (algae and periphyton) is no longer required by the BRP REMP.

III. Assessment of BRP ISFSI Operational Environmental Impact

Review and comparison of the 2022 BRP radiological environmental monitoring data to previous data shows that the parameters analyzed support the conclusion that ISFSI operations have had minimal environmental impact.

**Table 1. Sampling and Analysis Summary**

<u>Medium</u>	<u>Description</u>	<u>Location(s)</u>	<u>Type of Analysis</u>	<u>Number of Samples Collected</u>	<u>Frequency of Analysis</u>
TLD	BR-5, BR-6, BR-7, BR-18-25	18-25 BRP, 5-PT, 6-BC, 7-IR	Gamma Isotopic	44	Quarterly <sup>a</sup>
Lake Water	1 gallon composite	1-ST	Tritium, Gamma Isotopic	0	No Longer Required
Well Water	1 gallon grab/composite	Site Well	Tritium, Gamma Isotopic	0	No Longer Required
Monitoring Wells	1 gallon grab	MW 1-9	Tritium, Gamma Isotopic	0	No Longer Required
Sediment	Grab	1-ST, 24-STS, 25-STN, 26-LP	Gamma Isotopic	0	No Longer Required
Fish	Grab	1-ST Discharge	Gamma Isotopic	0	No Longer Required

**Table Notes**

<sup>a</sup> Only quarterly TLDs are required per Big Rock Point ODCM

**Table 2. Sample Data Summary**<sup>a</sup>

Medium or Pathway Sampled (Units)	Analysis Evaluated Versus Total Number Analyses Performed	Lower Limit of Detection (LLD) <sup>b</sup>	All Indicator Locations Mean <sup>c</sup> (Range)	All Control Locations Mean <sup>c</sup> (Range)	Nonroutine Measurements
<b><u>Direct Radiation:</u></b>					
TLD – Protected Area Fence (mR)	TLD (quarterly) <sup>d e</sup> 16/16	1.0	14.5 (8-28)	12/12	13.0 (8-17) None
TLD – ISFSI Outside Perimeter (mR)	TLD (quarterly) <sup>d e</sup> 16/16	1.0	12.7 (7-18)	12/12	13.0 (8-17) None

**Waterborne:**

Lake Water (pCi/L) Sample not required  
 Well Water (pCi/L) Sample not required

**Lake Sediment:**

Sediment (pCi/g dry) Sample not required

**Biota:**

Fish (pCi/g wet) Sample not required  
 Crayfish (pCi/g wet) Sample not required

**Table Notes:**

- <sup>a</sup> Values for sample locations with the greatest annual mean are provided in Table 3.
  - <sup>b</sup> Nominal LLD as defined in the Big Rock Offsite Dose Calculation Manual Section I, Table I-3 and vendor analytical capabilities.
  - <sup>c</sup> Mean and range data reported are based upon detectable measurements.
  - <sup>d</sup> Quarterly TLD results are normalized for 91 days net.
  - <sup>e</sup> Quarterly TLDs are read quarterly. Quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104.
- The results for the ISFSI TLDs and the average of the control TLDs measured in 2022 are summarized in the Table.

**Table 3. Reporting Results Greatest Mean Sampling Location**

<u>Medium</u>	<u>Type of Analysis</u>	<u>Location</u>	<u>High</u>	<u>Low</u>	<u>Mean</u>
TLD – Protected Area Fence (mR)	TLD (Quarterly) <sup>a b</sup>	BRP-23	28	12	20.0
TLD – ISFSI Outside Perimeter (mR)	TLD (Quarterly) <sup>a b</sup>	BRP-20	17	8	14.0
Lake Water (pCi/L)	No Longer Required				
Well Water (pCi/L)	No Longer Required				
Sediment (pCi/g dry)	No Longer Required				
Fish (pCi/g wet)	No Longer Required				
Crayfish (pCi/g wet)	No Longer Required				

**Table Notes:**

<sup>a</sup> Quarterly TLD results are normalized for 91 days net.

<sup>b</sup> Quarterly TLDs are read quarterly. Quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104. The results for the ISFSI TLDs and the average of the control TLDs measured in 2022 are summarized in the Table.



**Attachment 1**

**Sample Collection Anomalies**

None

**Attachment 2**

**Environmental Sample Schedule and Sample Location Maps**

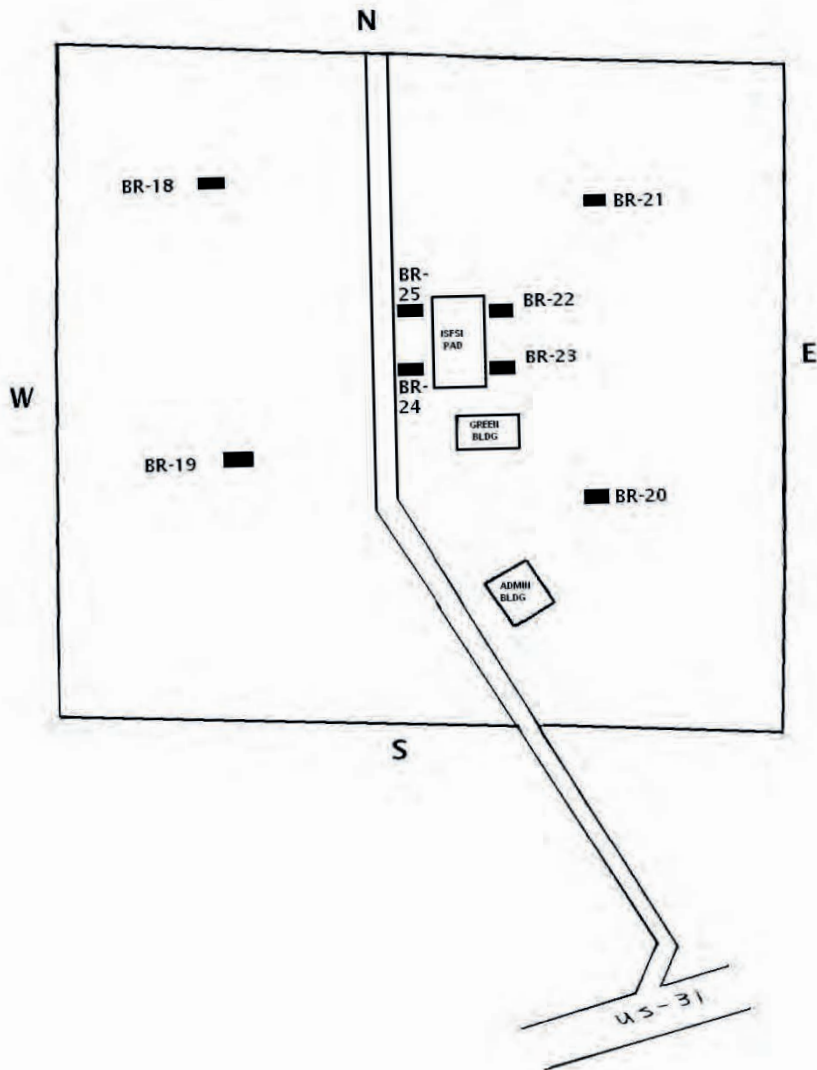
TABLE 1-1

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**

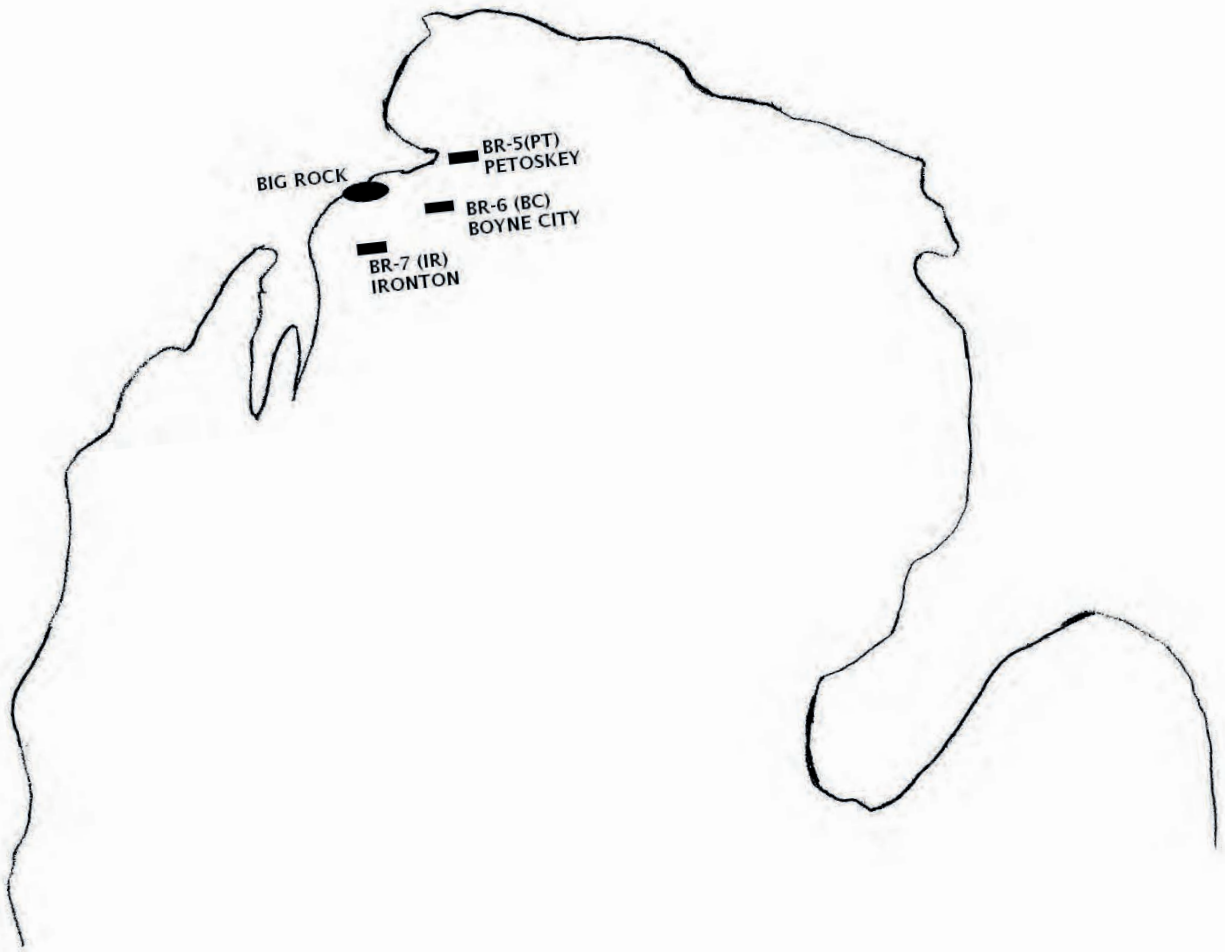
Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations <sup>a</sup>	Sampling and Collection Frequency	Type and frequency of Analysis
1. Direct Radiation <sup>b</sup>	11 monitoring stations either with two or more TLDs or one instrument for measuring and recording dose rate continuously, placed as follows <sup>c</sup> : a) Balance of stations (3) placed to serve as control stations b) Outside perimeter of ISFSI (4) <sup>d</sup> c) ISFSI protected area fence line (4) <sup>d</sup>	Quarterly	Gamma dose quarterly

- a. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to the Reporting Requirements of ODCM. Alternative media and locations may be chosen for any particular pathway if designated locations or media are not available, and appropriate substitutions are made within 30 days in the radiological environmental monitoring program.
- b. One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. The background dosimetry requirement also may be met through use of dosimeters shared with another facility, or from data provided by another entity, such as the State of Michigan, as appropriate for this site.
- c. For the purposes of this table, a TLD is considered to be one phosphor; two or more phosphors or phosphor readout zones in a packet are considered as two or more dosimeters.
- d. TLDs designated for ISFSI only operation.

### Big Rock Point Environmental Sample Location Map



### Big Rock Point Control TLD Locations



**Attachment 3**

**Radiological Environmental Monitoring Program (REMP) Data for  
Big Rock Point (BRP) Independent Spent Fuel Storage Installation (ISFSI)**



Dosimetry Services Division  
 2652 McGaw Avenue  
 Irvine, CA 92614

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 Fax: (949) 296-1144  
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ACCOUNT NO	LOCATION ID	WEARER NO	BADGE TYPE	BODY REGION	WEAR DATE	NAME	SERIAL NUM	BADGE ID	CONTROL		ANNEAL DATE	PROCESS ID	REC DATE	E1	E2	E3	E4	mR/Qtr
									ID	ID								
89567	00000DPT	1	17	ARE	1/1/2022	BR-5	2247154	8011612	109	1/7/2022	251537	4/12/2022	8	7	12	12	8	
89567	00000DPT	2	17	ARE	1/1/2022	BR-6	2247155	8012191	109	1/7/2022	251537	4/12/2022	9	8	12	13	9	
89567	00000DPT	3	17	ARE	1/1/2022	BR-7	2247156	8005072	109	1/7/2022	251537	4/12/2022	8	8	12	13	8	
89567	00000DPT	4	17	ARE	1/1/2022	BR-18	2247157	8008606	109	1/7/2022	251537	4/12/2022	7	7	11	12	7	
89567	00000DPT	5	17	ARE	1/1/2022	BR-19	2247158	8006730	109	1/7/2022	251537	4/12/2022	9	8	12	14	8	
89567	00000DPT	6	17	ARE	1/1/2022	BR-20	2247159	8014800	109	1/7/2022	251537	4/12/2022	9	8	14	15	8	
89567	00000DPT	7	17	ARE	1/1/2022	BR-22	2247160	8008789	109	1/7/2022	251537	4/12/2022	8	8	13	14	8	
89567	00000DPT	8	17	ARE	1/1/2022	BR-23	2247161	8011235	109	1/7/2022	251537	4/12/2022	12	12	18	21	12	
89567	00000DPT	9	17	ARE	1/1/2022	BR-24	2247162	8005223	109	1/7/2022	251537	4/12/2022	9	9	15	15	9	
89567	00000DPT	10	17	ARE	1/1/2022	BR-25	2247163	8011600	109	1/7/2022	251537	4/12/2022	8	8	13	14	8	
89567	00000DPT	13	17	ARE	1/1/2022	BR-CTRL1	2247166	8014402	109	1/7/2022	251537	4/12/2022	6	6	9	11	6	
89567	00000DPT	14	17	ARE	1/1/2022	BR-CTRL2	2247167	8011657	109	1/7/2022	251537	4/12/2022	5	5	10	11	5	
89567	00000DPT	15	17	ARE	1/1/2022	BR-21	2247168	8014405	109	1/7/2022	251537	4/12/2022	8	7	12	14	7	
89567	00000DPT	16	17	ARE	1/1/2022	BR-SP2	2247169	8011619	109	1/7/2022	251537	4/12/2022	6	5	10	11	6	
89567	00000DPT	17	17	ARE	1/1/2022	BR-SP1	2247170	8010634	109	1/7/2022	251537	4/12/2022	6	5	9	11	5	
89567	00000DPT		17		1/1/2022	CONTROL	2247153	8010014	109	1/7/2022	251537	4/12/2022	6	5	11	10	6	
89567	00001DPT	11	17	ARE	1/1/2022	BR-SH1	2246783	8010525	27	1/27/2022	251537	4/12/2022	4	4	9	11	4	
89567	00001DPT	12	17	ARE	1/1/2022	BR-SH2	2246784	8009146	27	1/27/2022	251537	4/12/2022	4	4	8	9	4	



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ACCOUNT NO	LOCATION ID	WEARER NO	BADGE TYPE	BODY		WEAR DATE	NAME	CONTROL				PROCESS ID	REC DATE	E1	E2	E3	E4	mR/Qtr
				REGION	ID			SERIAL NUM	BADGE ID	ID	ANNEAL DATE							
89567	00000DPT	1	17	ARE	4/1/2022	BR-5	2248748	8010646	111	3/17/2022	252391	7/13/2022	12	12	16	16	12	
89567	00000DPT	2	17	ARE	4/1/2022	BR-6	2248749	8014680	111	3/17/2022	252391	7/13/2022	13	13	16	17	13	
89567	00000DPT	3	17	ARE	4/1/2022	BR-7	2248750	8011777	111	3/17/2022	252391	7/13/2022	14	14	17	19	14	
89567	00000DPT	4	17	ARE	4/1/2022	BR-18	2248751	8014448	111	3/17/2022	252391	7/13/2022	12	12	16	17	12	
89567	00000DPT	5	17	ARE	4/1/2022	BR-19	2248752	8004843	111	3/17/2022	252391	7/13/2022	14	14	16	19	14	
89567	00000DPT	6	17	ARE	4/1/2022	BR-20	2248753	8013586	111	3/17/2022	252391	7/13/2022	15	16	18	20	15	
89567	00000DPT	7	17	ARE	4/1/2022	BR-22	2248754	8010600	111	3/17/2022	252391	7/13/2022	13	13	16	18	13	
89567	00000DPT	8	17	ARE	4/1/2022	BR-23	2248755	8006146	111	3/17/2022	252391	7/13/2022	20	20	27	29	20	
89567	00000DPT	9	17	ARE	4/1/2022	BR-24	2248756	8012552	111	3/17/2022	252391	7/13/2022	13	13	18	20	13	
89567	00000DPT	10	17	ARE	4/1/2022	BR-25	2248757	8011713	111	3/17/2022	252391	7/13/2022	13	13	17	18	13	
89567	00000DPT	11	17	ARE	4/1/2022	BR-SH1	2248758	8010053	111	3/17/2022	252391	7/13/2022	8	9	12	12	8	
89567	00000DPT	12	17	ARE	4/1/2022	BR-SH2	2248759	8011449	111	3/17/2022	252391	7/13/2022	8	8	11	13	8	
89567	00000DPT	13	17	ARE	4/1/2022	BR-CTRL1	2248760	8013499	111	3/17/2022	252391	7/13/2022	8	9	11	12	8	
89567	00000DPT	14	17	ARE	4/1/2022	BR-CTRL2	2248761	8016154	111	3/17/2022	252391	7/13/2022	8	8	11	12	8	
89567	00000DPT	15	17	ARE	4/1/2022	BR-21	2248762	8014694	111	3/17/2022	252391	7/13/2022	11	12	14	16	12	
89567	00000DPT	16	17	ARE	4/1/2022	BR-SP2	2248763	8013682	111	3/17/2022	252391	7/13/2022	8	8	11	11	8	
89567	00000DPT	17	17	ARE	4/1/2022	BR-SP1	2248764	8010871	111	3/17/2022	252391	7/13/2022	7	8	10	11	8	
89567	00000DPT		17		4/1/2022	CONTROL	2248747	8013590	111	3/17/2022	252391	7/13/2022	8	8	13	14	8	



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ACCOUNT		WEARER	BADGE	BODY		CONTROL											
NO	LOCATION ID	NO	TYPE	REGION	WEAR DATE	NAME	SERIAL NUM	BADGE ID	ID	ANNEAL DATE	PROCESS ID	REC DATE	E1	E2	E3	E4	mR
89567	00000DPT	1	17	ARE	7/1/2022	BR-5	2250937	8004566	113	6/9/2022	253242	10/11/2022	14	14	15	17	14
89567	00000DPT	2	17	ARE	7/1/2022	BR-6	2250938	8009335	113	6/9/2022	253242	10/11/2022	14	14	17	19	14
89567	00000DPT	3	17	ARE	7/1/2022	BR-7	2250939	8013285	113	6/9/2022	253242	10/11/2022	15	15	18	18	15
89567	00000DPT	4	17	ARE	7/1/2022	BR-18	2250940	8008965	113	6/9/2022	253242	10/11/2022	13	13	13	15	13
89567	00000DPT	5	17	ARE	7/1/2022	BR-19	2250941	8007988	113	6/9/2022	253242	10/11/2022	15	16	17	19	15
89567	00000DPT	6	17	ARE	7/1/2022	BR-20	2250942	8007943	113	6/9/2022	253242	10/11/2022	17	17	17	20	17
89567	00000DPT	7	17	ARE	7/1/2022	BR-22	2250943	8005177	113	6/9/2022	253242	10/11/2022	13	13	18	22	13
89567	00000DPT	8	17	ARE	7/1/2022	BR-23	2250944	8008206	113	6/9/2022	253242	10/11/2022	20	21	27	32	20
89567	00000DPT	9	17	ARE	7/1/2022	BR-24	2250945	8007666	113	6/9/2022	253242	10/11/2022	12	11	15	17	11
89567	00000DPT	10	17	ARE	7/1/2022	BR-25	2250946	8010186	113	6/9/2022	253242	10/11/2022	13	13	17	19	13
89567	00000DPT	11	17	ARE	7/1/2022	BR-SH1	2250947	8016155	113	6/9/2022	253242	10/11/2022	9	9	13	14	9
89567	00000DPT	12	17	ARE	7/1/2022	BR-SH2	2250948	8008683	113	6/9/2022	253242	10/11/2022	9	9	11	14	9
89567	00000DPT	13	17	ARE	7/1/2022	BR-CTRL1	2250949	8006558	113	6/9/2022	253242	10/11/2022	9	9	11	12	9
89567	00000DPT	14	17	ARE	7/1/2022	BR-CTRL2	2250950	8012568	113	6/9/2022	253242	10/11/2022	9	10	12	14	10
89567	00000DPT	15	17	ARE	7/1/2022	BR-21	2250951	8003060	113	6/9/2022	253242	10/11/2022	12	13	15	18	12
89567	00000DPT	16	17	ARE	7/1/2022	BR-SP2	2250952	8006920	113	6/9/2022	253242	10/11/2022	8	9	11	13	8
89567	00000DPT	17	17	ARE	7/1/2022	BR-SP1	2250953	8005823	113	6/9/2022	253242	10/11/2022	9	9	12	13	9
89567	00000DPT		17		7/1/2022	CONTROL	2250936	8011922	113	6/9/2022	253242	10/11/2022	9	9	13	13	9





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ACCOUNT NO	LOCATION ID	WEARER NO	BADGE TYPE	BODY REGION	WEAR DATE	NAME	SERIAL NUM	BADGE ID	CONTROL ID	ANNEAL DATE	PROCESS ID	REC DATE	E1	E2	E3	E4	mR/Qtr
89567	00000DPT	1	17 ARE	10/1/2022	BR-5		2252437	8010258	115	9/19/2022	254139	1/12/2023	16	16	20	21	16
89567	00000DPT	2	17 ARE	10/1/2022	BR-6		2252438	8005519	115	9/19/2022	254139	1/12/2023	16	16	20	22	16
89567	00000DPT	3	17 ARE	10/1/2022	BR-7		2252439	8009748	115	9/19/2022	254139	1/12/2023	17	17	23	24	17
89567	00000DPT	4	17 ARE	10/1/2022	BR-18		2252440	8010849	115	9/19/2022	254139	1/12/2023	15	15	19	21	15
89567	00000DPT	5	17 ARE	10/1/2022	BR-19		2252441	8016159	115	9/19/2022	254139	1/12/2023	18	17	21	24	18
89567	00000DPT	6	17 ARE	10/1/2022	BR-20		2252442	8012041	115	9/19/2022	254139	1/12/2023	36	16	23	24	16
89567	00000DPT	7	17 ARE	10/1/2022	BR-22		2252443	8011248	115	9/19/2022	254139	1/12/2023	16	16	23	24	16
89567	00000DPT	8	17 ARE	10/1/2022	BR-23		2252444	8010206	115	9/19/2022	254139	1/12/2023	29	28	35	35	28
89567	00000DPT	9	17 ARE	10/1/2022	BR-24		2252445	8011758	115	9/19/2022	254139	1/12/2023	19	19	27	27	19
89567	00000DPT	10	17 ARE	10/1/2022	BR-25		2252446	8013258	115	9/19/2022	254139	1/12/2023	17	16	22	23	16
89567	00000DPT	11	17 ARE	1/1/2022	BR-SH1		2247164	8009025	109	1/7/2022	254139	1/12/2023	26	25	34	35	25
89567	00000DPT	11	17 ARE	10/1/2022	BR-SH1		2252447	8009626	115	9/19/2022	254139	1/12/2023	9	9	15	17	9
89567	00000DPT	12	17 ARE	1/1/2022	BR-SH2		2247165	8012313	109	1/7/2022	254139	1/12/2023	28	29	32	38	28
89567	00000DPT	12	17 ARE	10/1/2022	BR-SH2		2252448	8016059	115	9/20/2022	254139	1/12/2023	8	9	15	20	8
89567	00000DPT	13	17 ARE	10/1/2022	BR-CTRL1		2252449	8012057	115	9/20/2022	254139	1/12/2023	8	9	13	14	8
89567	00000DPT	14	17 ARE	10/1/2022	BR-CTRL2		2252450	8014551	115	9/20/2022	254139	1/12/2023	8	8	12	14	8
89567	00000DPT	15	17 ARE	10/1/2022	BR-21		2252451	8011726	115	9/20/2022	254139	1/12/2023	14	13	18	19	14
89567	00000DPT	16	17 ARE	10/1/2022	BR-SP2		2252452	8013327	115	9/20/2022	254139	1/12/2023	9	9	12	13	9
89567	00000DPT	17	17 ARE	10/1/2022	BR-SP1		2252453	8014835	115	9/20/2022	254139	1/12/2023	8	8	15	15	8
89567	00000DPT		17	10/1/2022	CONTROL		2252436	8010203	115	9/19/2022	254139	1/12/2023	8	8	24	17	8