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Structural Inte	grity Assessment of	Flaw Found in Se	ervice Water Lin	e 24"-JGD-6		
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	CP-02958M2		<u>00</u>		Service Water System Name	
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1.0 PURPOSE

The purpose of this calculation is to evaluate the structural integrity of a location of service water piping which was determined to have a service induced flaw. The service water line (24"-JGD-6), which is the discharge header for the reactor building component cooling water (RBCCW) heat exchangers, was determined to have a through-wall leak on the -5' elevation of the Unit 2 Auxiliary Building in the vicinity of the PMW pumps as described in CR M2-00-0155 (Reference 1). This calculation supports operation until a scheduled outage exceeding 30 days or refueling is reached and a code repair can be made.

2.0 BACKGROUND

Generic Letter 90-05 (Reference 2) provides NRC guidance regarding flaws that exceed the code acceptance limits for piping that is in service. Specifically, it permits non-code repairs to be made to Class 3 piping systems provided that, in part, adequate structural integrity can be demonstrated. Generic Letter 90-05 also provides an analytical technique based upon linear fracture mechanics for demonstrating structural integrity.

Recently, the NRC approved use of ASME Section XI, Code Case N-513 (Reference3) an indicated in the Federal Register dated September 22, 1999 (Volume 64, Number 183, Rules and Regulations, page 51369-51400). This Code Case also provides evaluation criteria for temporary acceptance of flaws in Class 3 piping. This Code Case is limited to moderate energy Class 3 piping and is also based upon linear fracture mechanics. However, this Code Case addresses planar flaws and has limited non-planar flaw geometry size which does not encompass a hole similar to that found in the plant.

3.0 SCOPE

This calculation performs an assessment of structural integrity for the local stress conditions in line 24"-JGD-6, spool piece SK0923, at the location of the flaw. This calculation does not demonstrate design basis qualification but supports continued operation with a temporary non-structural repair. The methods employed include are valid for moderate energy piping systems (design pressure < 275 psig, maximum operating temperature < 200°F).

This calculation is part of the justification for continued operation.

4.0 REFERENCES

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4.1 CR M2-00-0155, dated 1/18/00.

4.2 NRC Letter, "Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping (Generic Letter 90-05)" dated June 15, 1990.

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4.3 Case N-513, "Evaluation Criteria for Temporary Acceptance of Flaws in Class Three Piping, Section XI, Division 1," approval date August 14, 1997.

4.4 Ultrasonic Examination Straight Beam Measurements, AWO Number M2-00-00899, dated 1/19/00 (Attachment 1).

4.5 NU Calculation No. 79-176-250GP, Revision 06, "Service Water Discharge Header Problem 112," dated 8/17/99.

4.6 Ultrasonic Examination Straight Beam Measurements, AWO Number M2-00-00924, dated 1/20/00 (Attachment 2).

4.7 NU drawing 25303-20150 Sh. 106 Rev. 21, "Millstone Nuclear Power Station-Unit 2, Service Water Return From RBCCW Exchangers."

4.8 NU drawing 25303-20194 Sh. 923 Rev. 6, "Millstone Unit #2, Serv. Water Return Fr. RBCCW Exch."

5.0 ASSUMPTIONS

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5.1 The flaw geometry found represents localized corrosion with a hole like appearance extending radially from the inside surface due to a defect in the lining. The diameter appears to be approximately 2 inches (Reference 4.4). A hole of 2.5 inches will be assumed to provide additional conservatism and margin for further degradation.

5.2 The flaw will be assumed to be through-wall for the 2.5 inch assumed length.

6.0 METHOD OF CALCULATION

The structural evaluation of the identified flaw will be performed in accordance with the guidance provided by Generic Letter 90-05. This method utilizes linear fracture mechanics to determine the crack driving force of the assumed crack size. In the case of piping, it postulates that the flaw is circumferentially oriented and the stresses are assumed to be bending stresses. The resultant "K" determined from the closed form solution is compared to a bounding critical stress intensity factor appropriate for the material.

The stresses used in the evaluation of this flaw were obtained from the pipe stress analysis of record (Reference 4.5). The stresses and the flawed location should will include the effects of dead weight, pressure, thermal expansion and safe-shutdown earthquake. The node which is closest to the flaw will be used to obtain the stresses and loads. The other material properties and loads required for this information will be extracted from this calculation.

7.0 BODY OF CALCULATION

The equations used in determination of the applied stress intensity factor, K (ksi \sqrt{in}), will be computed based upon the following equations obtained from Reference 4.2 for through-wall flaws.

 $K = 1.4 * s * F * (3.1416 * a)^{0.5}$ (ksi \sqrt{in})

where; F = the geometry factor (dimensionless) a = the half crack length (inches) s = the stress at the flawed location (ksi)

The geometry factor, F, is determined by the following: $F=1 + A*c^{1.5} + B*c^{2.5} + C*c^{3.5}$, where:

the coefficients of the polynomial distribution are given by:

 $A = -3.26543 + 1.52784*r - 0.072698*r^{2} + 0.0016011*r^{3}$ $B = 11.36322 - 3.91412*r + 0.18619*r^{2} - 0.004099*r^{3}$ $C = -3.18609 + 3.84763*r - 0.18304*r^{2} + 0.00403*r^{3}$ and c = a/(3.1416*R) (non-dimensional)

 $r = R/t_{min}$ (non-dimensional)

In the preceding equations for A, B and C, the variables "R" is the mean radius of the degraded pipe (inches) and the " t_{min} " is interpreted to be the minimum thickness of the remaining pipe. This value of the " t_{min} " will be established based upon review of the ultrasonic inspection data from around the remainder of the section of the pipe. The variable "a" is the half crack length (inches) assumed to be 1.25 inches (2.5inches/2).

A summary of pertinent design information follows.

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The flaw location is approximately six feet above the floor on the -5' elevation. Based upon review of the isometric drawing (Reference 4.7), the flaw location is spool piece SK-923 [JGD-6-20] (Reference 4.8).

Pipe Line No. 24"-JGD-6 (References 4.4 and 4.5 page 25) Design Pressure = 100 psig (Reference 4.5 page 25) Maximum Operating Temperature = 120°F (Reference 4.5 page 25) Pipe Size and Schedule = 24 inch schedule 40 (Reference 4.8)

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Pipe OD = 24 inches, Nominal Pipe Thickness = 0.688 inches (Reference 4.5 page 35)

Pipe Material = A 53 Gr B seamless steel pipe (Reference 4.8)

The applied stress, s, was determined from review of the B31.1 piping stress analysis (Reference 4.5). Review of the ADLPIPE model was performed to determine the correct nodal location. The vertical run of piping which contains the flaw begins at node 960 and 980 (elbow to elbow, reference 4.5 page 25). Further review (Reference 5, Attachment J, Sheet J12) shows that piping run 970 to 975 provides the closest elevation (4.66 ft above the floor) and consequently Node 975 will be used to represent the flaw loading conditions.

The applied stress, s, at the flawed location (Node 975) is the combination of dead weight, pressure, thermal expansion and design basis earthquake (DBE).

Dead weight + pressure + DBE = 1544 psi =1.544 ksi (Reference 4.5, Attachment J, Sh. J623)

The thermal expansion stress was obtained based upon the maximum value of bending stress from the parametric of hot run values performed in Reference 5. The maximum thermal stress at node 975 was determined to be "A & C Hot".

Thermal Expansion Stress = 1109 psi = 1.109 ksi (Reference 4.5, Attachment J, Sh. J240.)

The Total Applied Bending Stress, s, = 1.544 ksi + 1.109 ksi = 2.653 ksi

Based upon review of the available ultrasonic inspection information (Reference 4.4 and 4.6), there is a hole-like radial flaw of approximately 2 inches in diameter. Outside this region, the data indicates approximately nominal pipe thickness as would be expected since this is a coated pipe (no general surface corrosion). Review of Reference 7 shows that the minimum readings are O3, O4, P3 and P4 which occur on the periphery of the hole-like flaw. The remaining values approach nominal pipe thickness. Therefore, an average value of 0.691 inch (Ref. 4.8) is appropriate for representing the remaining pipe section. Paint thickness measurements were also taken which reflect an average paint thickness of 10.3 mils. To ensure a conservative pipe thickness a value of 0.031 inch or three times the paint thickness will be subtracted from the average wall thickness providing a "t_{min}" of 0.660 inches (0.691 inch - 0.031 inch).

Computing values,

R = (24 in/2) - (0.66 in/2) = 11.67 in

$$r = 11.662$$
 in / 0.66 in = 17.682 in

$$A = -3.26543 + 1.52784*17.682 - 0.072698*(17.682)^{2} + 0.0016011*(17.682)^{3}$$

= 9.87191

 $B = 11.36322 - 3.91412*17.682 + 0.18619*(17.682)^{2} - 0.004099*(17.682)^{3}$ = -22.2938

 $C = -3.18609 + 3.84763*(17.682) - 0.18304*(17.682)^{2} + 0.00403*(17.682)^{3}$ = 29.89865

Given a = 1.25 in, then c = 1.25 in /(3.1416*11.67 in) = 0.034095

Calculating the Shape Factor, F,

 $F=1+9.676647*(0.034095)^{1.5}+-21.7939*(0.034095)^{2.5}+29.40716*(0.034095)^{3.5}$ = 1.058

Computing K,

 $K = 1.4*2.653 \text{ ksi}*1.058*(3.1416*1.25 \text{ in})0.5 = 7.78 \text{ (ksi}\sqrt{\text{in}})$

Given that the material is a ferritic steel, the lower bound fracture toughness provided by reference 4.2 is 35 ksi \sqrt{in} . Since the applied stress intensity factor is less than the available fracture toughness of 35 ksi \sqrt{in} , crack extension is not expected to occur and structural integrity will be maintained for all the design loads including earthquake.

8.0 SUMMARY OF RESULTS

The flaw found in service water piping line 24-JGD-6, spool piece SK-923, was evaluated for structural integrity using the methods provided by Generic Letter 90-05. This method uses linear elastic fracture mechanics to determine an applied stress intensity factor using all the design loads with DBE and compares it to a lower bound fracture toughness. The applied stress intensity factor of 7.8 ksi $\sqrt{$ in is less than the available fracture toughness of 35 ksi $\sqrt{$ in, crack extension is not expected to occur and structural integrity will be maintained for all the design loads including earthquake.

Calculation Review Comment and Resolution Form

(Sheet 1 of 2)

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DCM FORM of 2% Page 1

neview Comments Sheer みのドシ Alternative Evaluation of Non-Planar Through-Wall Flaw

This evaluation of the subject flaw is prepared as an alternative to the evaluation performed in accordance with GL 90-05.

ASME Code Case N-597 has been accepted as an alternative by the NRC per letter dated 2/23/1999 for use on Millstone Units 2 and 3. In this case, paragraph -3500(5)(f) states that for low energy Class 3 piping exhibiting through-wall leakage, "evaluation methods and acceptance criteria shall be specified by the Owner." No further requirements are provided.

A reasonable approach for relatively small through-wall flaws in ductile piping materials is the branch reinforcement rules and acceptance criteria as given in the original construction Code, which is ANSI B31.1-1967 for this piping. The Code approach for branch connections is basically an area replacement evaluation, in which the area lost by cutting the hole for the branch piping is compensated for by existing or added reinforcing material surrounding the hole. Any pipe wall thickness not needed for pressure boundary integrity is considered available for reinforcement. A non-planar through-wall flaw is structurally similar to the lost pipe wall area cut out for a branch connection. The Code rules and criteria are specified in paragraph 104.3, "Intersections", in parts 2(b) and 2(c) and are illustrated in Figure 104.3.1(d).

For the subject flaw with a conservatively assumed diameter of 2.5", per 104.3(2)(b) the required reinforcing area, A_{reg} is

 $A_{reg} = 1.07 t_{mh} d_1$

where t_{mh} is the header pipe minimum required wall thickness, calculated as 0.079 inches in the main body of the calculation and d_1 is 2.5 inches as assumed

$$A_{reg} = (1.07)(0.079)(2.5) = 0.21$$
 inches²

The available reinforcing area, considering both sides of the flaw, is calculated as

 $A_1 = 2(d_2)(T_h - mill tolerance - t_{mh})$

where for T_h - mill tolerance we will use the measured wall thickness adjacent to the flaw, 0.65 inches, d_2 is equal to d_1 , and t_{mh} is as stated above

$$A_1 = 2(2.5)(0.650 - 0.079) = 2.85$$
 inches²

Since the available reinforcing area greatly exceeds the required reinforcing area:

 $A_1 = 2.85 > A_{reg} = 0.21$ inches²,

the branch reinforcement rules of B31.1 are effectively satisfied and the through-wall flaw is considered structurally stable.

The piping stresses for longitudinal pressure + deadload + DBE loadings at node 970 was calculated as 1,711 psi in the design basis calculation (page J196), compared to an allowable of 34,380 psi (page 62). Since the through-wall flaw constitutes a relatively small reduction in the piping cross section the presence of the flaw is not significant.

In conclusion, the flaw is acceptable from a structural standpoint and occurs at a location of low service stress. Therefore it is acceptable for continued operation.

Intermediate N N A Search Unit Data Intermediate A A A Manufacturer PANA. Intermediate A A A Type No. D221-RM Couplant Data Intermediate A A A Serial No. 19510 Frequency 5 MHZ. Strate Surface Painted Yes Size ,312" RinkInut C No. 99/20 B Couplant Data Surface Painted Yes Size ,312" RinkInut C No. 99/20 B Rinkinut C No. O000387211 ACT mits = X Sketch/Comments Area - Attach Photo(s) of Relevant Conditions Separately ACT X 3 mits = X ACT X 3 mits = X Auround Blistered Paint. recorded Auround Blistered Paint. recorded Area 	Plant M, Plant M, eystem & Zon e organisation (component b) (zomponent b) (zomponent b) (zomponent b) (zomponent b)	ortheast uclear Energy ///Stone Una with 2326A		ULTRAS	ONIC EX	AMINATI	NC	or 1						
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Northeast					AMINATIC		
Nuclear Energy				MEASUR			
	2	Page/	0	12			
System & Zone No. 2326A	•	_ Exam Data					
Component ID <u>SK 0923</u>		_ AWO Num			-00-00	124	
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Examination Purpose	2				1. JGD-6		
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REVIEW

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Level of Use Information

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NU-UT-5 Rev. 10 [•]Page <u>24</u> of 24 | AH. 2 p. B2 of B3 Calc. No. 00-CP-02958M2 Rev. 00 p. 13 of 18

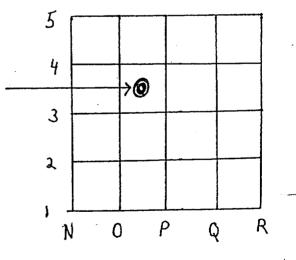
Page 101 01/19/00 24JGD-6.TXT

Main Section (0) Rows: 5 Cols: 38 Direction: Clockwise Offset: 0

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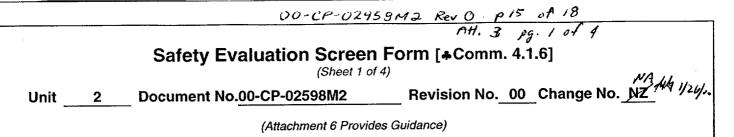
Leak

ection Summary

aximum Reading = 0.719 ( 4, H) Average inimum Reading = 0.636 ( 4, P) Standard Deviation = 0.692 otal Readings = 190

= 0.691

AH. 2 p. B3 of B3 Ca	exculation No. 00-CP-02958M2 Rev. 00 p.14 of 18
ATTAC	HMENT 1
Northeast Nuclear Energy	COATING THICKNESS EXAM DATA SHEET
Plant         MP         Unit         Z           System         2326A         Zone         N/A           AWO No.         M2-00-00929	Design DWG Number <u>25203-2019</u> - 923 Component Description <u>Serv WATER</u> FROM RECOW Component Identification <u>SK-0924</u> Pipe Size <u>24 INCH</u>
Exam. Purpose <u>Eng</u> , <u>Info</u> , Thickness Meter Make/Model <u>Fischer/Deltascope</u> RE/PMMS No. <u>N/A</u> Serial Number <u>042-12554A</u> Calibration Range <u>2,93 - 25,8 Mils</u>	Micrometer         Micrometer PMMS No/682         Serial Number/682         Calibration Due Date2-/3-00
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Coating Thickness     Minimum     7.16     Maxim       Comments	um <u>13,9</u> Average <u>10,3</u>
	1:1 1 M ///
Examiner (print & sign)       M, chae/ Brehler/ Ma         Reviewer (print & sign)       R. T. FUller         Engineering Reviewer (print & sign)       N/A         ANII (when applicable)       N/A         Level III or Designee Signature for Certification	Charles     Building     Level     TL     Date     1/19/00       Date      Level      Date     1/00/00       Level      Date      N/A     Date        Date      Date
Proce	dure NU-CT-1 Rev. 3 Page 7 of 7



A. SUMMARY INFORMATION (Completed by the Preparer)

## 1. Description of the Proposed Change, Test or Experiment

A degraded condition exists in Unit 2 service water piping spool piece, as documented in CR M2-00-0155. The degraded condition is a localized corrosion of the pipe pressure boundary, resulting in loss of pressure boundary thickness including a small region that is through-wall and permits leakage of service water. The degraded pipe wall is limited to a region about 2 inches in diameter. As permitted by NRC Generic Letter 90-05, an evaluation has been performed in accordance with criteria stated in the letter, with the conclusion that the flaw will remain structurally stable until a Code repair or replacement can be performed at the next outage.

This safety evaluation screening is prepared relative to the determination of the flaw's structural integrity as documented in this calculation. The calculation and this screen do not address the compensatory actions to limit leakage or any other aspects of compliance with GL 90-05; these aspects are considered in DCN DM2-00-0039-00.

## B. SCREENING QUESTIONS (Completed by the Preparer)

1. Will implementation of the proposed Change, Test or Experiment require a revision to the Operating License or the Technical Specifications? (If "Yes," complete (a.), go to Section D and sign as Preparer - prior NRC review and approval is required. If "No," complete (b) and go to Question 2.)

Yes (OL or T/S change required) No

a. Reason OL or T/S change required and sections impacted:

b. Reason OL or T/S change not required and sections reviewed:

Evaluation of degraded piping for continued operation is permitted by the NRC in accordance with GL 90-05. The process requires submittal of the evaluation to the NRC and is subject to NRC review and approval. A GL 90-05 request was most recently submitted for Unit 2 in 1994 under letter B14776. There are no licensing provisions or commitments which prohibit implementing the process at Millstone. Therefore the GL 90-05 evaluation is in accordance with the licensing basis, and no change to the license is required.

Reviewed OL and T/S through change 253, T/S section 3/4.4.10.

Searched Licensing Commitment Database keywords "90-05", "flaw", "leak"

2. Is the proposed Change, Test or Experiment fully bounded by the scope of a previously approved Safety Evaluation? (Refer to Section B.2 of Attachment 6 to determine if fully bounded. If "Yes," complete (a.) and (b.), go to Section D and sign as Preparer - a new SE is not required. If "No," go to Question 3.)

Yes (new SE not required) XNO

- a. Identification of previously approved SE:
- b. Reason previously approved SE fully bounds proposed activity:

RAC 12 Attachment 4 Rev. 2

	00-CP-02958 M2 Rev. 0 p. 16 01 18 Att. 3 p. 2 of 4
	Safety Evaluation Screen Form [+Comm. 4.1.6]
	(Sheet 2 of 4) 2 Document No.00-CP-02598M2 Revision No. 00 Change No. MZ
Unit _	2 Document No.00-CP-02598M2 Revision No. 00 Change No. NZ , 1900
3.	Is it obvious that the proposed Change, Test or Experiment requires a Safety Evaluation? (If "Yes," a SE is required – complete (a.), go to Section D and sign as Preparer. If "Not Obvious," go to Question 4. If it is not clear, a SE is required.) Yes (SE required) X Not Obvious
	a. Reason SE required:
4.	Does the proposed activity meet the criteria of a Non-Intent Change to the Facility or procedures as described in the SAR? (Refer to the guidance in Section B.4 of Attachment 6 to determine if Non-intent. If a Non-intent Change, check "Yes," complete (a.) go to Section D, and sign as Preparer - a SE is not required. If "No," go to Question 5.)
	Yes (SE not required) No
	a. Reason SE not required and SAR sections reviewed:
5.	Will implementation of the proposed activity modify the Facility as described in the SAR? (Per the guidance in Section B.5 of Attachment 6, ensure that you check "Yes" if the proposed activity could directly or indirectly as a result of a system interaction, introduce different failure modes or affect the function or reliability of equipment described in the SAR. If "Yes," complete (a.), go to Section D and sign as Preparer a SE is required. If "No," complete (b.) and go to Question 6.) Yes (SE required) X No
	a. Reason SE required and SAR sections impacted:
	b. Basis for "No" and SAR sections reviewed:
	The flaw has been identified as a degraded condition under Millstone's corrective actions program, which meets the requirements of 10CFR 50 Appendix B. Since the flaw is scheduled for corrective action at the next available outage of sufficient duration, by the guidance provided in Generic Letter 91-18 Rev.1 the flaw itself is not required to be considered a plant change for the purpose of 10CFR 50.59 evaluations.
	Reviewed UFSAR through change 57, 7/16/99, Section 9.7, and TRM through change 53, 1/6/00.
6.	Will implementation of the proposed activity modify procedures as described in the SAR? (Refer to the list of supplemental questions in Section B.6 of Attachment 6 to evaluate the need for a SE. If "Yes," complete (a.), go to Section D and sign as Preparer - a SE is required. If "No," complete (b.) and go to Question 7.)
	Yes (SE required) XNO
	a. Reason SE required and SAR sections impacted:
	b. Basis for "No" and SAR sections reviewed:
	The evaluation of the flaw was performed consistent with the existing procedure for GL 90-05 evaluations, specification SP-ST-ME-947 Rev. 1. There are no procedural RAC 12 Attachment 4
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		anges required for evaluation of the fla anges to procedures as described in th	aw. Therefore there are no required						
		viewed UFSAR through change 57, 7/ ough change 53, 1/6/00.	/16/99, Chpt. 12 and Section 9.7, and TRM						
7.	t <b>he SA</b> "Yes," o Section	R? (Refer to the list of examples in Section B.	<b>nvolve a Test or Experiment</b> <i>not</i> <b>described in</b> 7 of Attachment 6 to determine the need for a SE. If parer - a SE is required. If "No," complete (b.), go to						
	a. Re	eason SE required:							
	b. <i>B</i> á	sis for "No" and SAR sections reviewe	ed:						
	pla ma	ant. The evaluation activity does not re	ity that does not itself affect operation of the equire operation of the plant in any specified parameter changes. Therefore there is no law evaluation.						
	Re	•	/16/99, Chpt. 13 and Section 9.7, and TRM						
C. SI	JMMAR	(Completed by the Approver)							
1.	B.1 che	vision to the technical specifications or ecked,"Yes")	operating license required? ("Yes, if Question						
2.	(Yes, if	esign Engineering Screening Evaluation proposed Change is an Intent Change to the F	n per the Design Change Manual Required? Facility as described in the SAR)						
3.		w Safety Evaluation required? (Yes, if Qu	uestion B.1, B.3, B.5, B.6 or B.7 is checked "Yes")						
4.	activity	ARCR per RAC 03 necessary? (Yes, if re will cause the FSAR description to be incorrec No No Not Applicable	esponses to Question B.5 or B.6 indicate proposed t)						
5.	Questic	proposed activity fully bounded by a proposed activity fully bounded by a propon B.2 is checked "Yes")	eviously approved Safety Evaluation? (Yes, if						
6.	<b>evalua</b> SAR as	Quality Assurance Plan, Emergency Plantion per RAC 01? (Yes, if response to Quests being affected by the proposed activity)	an or Security Plan affected, requiring an stion B.5, B.6, or B.7 identifies these portions of the						
			RAC 12 Attachment 4						

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D. AF	PROVAL				
	Preparer: <u>GLENN A. GANDING</u> Pr	int and Sign	Hand	Date:	100
	Reviewer: (if required)	int and Sign		Date:	
			-	Date: 1/24/	/
	Approver: Approver:	Int and Sign	ierson ysere	Date: <u>1/1/-</u>	
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			RAC 12 Rev. 2	Attachment 4	

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