



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II**

245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

May 17, 2017

Mr. Daniel G. Stoddard
Senior Vice President and Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: ERRATA – SURRY POWER STATION – NRC TEAM INSPECTION REPORT
05000280/2017009 AND 05000281/2017009

Dear Mr. Stoddard:

The U.S. Nuclear Regulatory Commission (NRC) identified two administrative errors on the cover letter for NRC Inspection Report 05000280/2017009 and 05000281/2017009, dated April 11, 2017 (ADAMS Accession No. ML17101A808). First, the addressee should have been “Mr. Daniel G. Stoddard”. Second, there were extraneous words in the second paragraph. Specifically, the last sentence should have stated: “Within these areas, the inspection involved examination of selected procedures and records, observation of activities, and interviews with station personnel.” As a result, the NRC has reissued the report in its entirety to correct these errors.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, “Public Inspections, Exemptions, Requests for Withholding.”

Sincerely,

/RA/

Philip J. McKenna, Acting Chief
Reactor Projects Branch 7
Division of Reactor Projects

Docket Nos.: 50-280, 50-281
License Nos.: NPF-32, NPF-37

Enclosure:
IR 05000280/2017009 and 05000281/2017009
w/Attachment: Supplemental Information

cc Distribution via ListServ

D. Stoddard

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05000280/2017009 AND 05000281/2017009 May 17, 2017

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**ADAMS Accession No. ML17137A194 ADAMS Package Accession No. ML17137A200
NRC IR 05000280/2017009 AND 05000281/2017009 ADAMS Accession No. ML17110A808**

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 50-280, 50-281

License No.: DPR-32, DPR-37

Report No.: 05000280/2017009, 05000281/2017009

Licensee: Virginia Electric and Power Company (VEPCO)

Facility: Surry Power Station, Units 1 and 2

Location: 5850 Hog Island Road
Surry, VA 23883

Dates: March 13 – 16, 2017

Inspectors: S. Freeman, Senior Reactor Analyst, RII (Team Leader)
G. MacDonald, Senior Reactor Analyst, RII
C. Jones, Resident Inspector, Surry

Approved by: Philip J. McKenna, Acting Chief
Reactor Projects Branch 7
Division of Reactor Projects

Enclosure

SUMMARY

IR 05000280/2017009, 05000281/2017009; 03/13/2017 – 03/16/2017; Surry Power Station Units 1 and 2; Temporary Instruction 2515/191, Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans issued December 23, 2015.

The inspection covered a one-week inspection by two senior reactor analysts and one resident inspector. No NRC-identified or self-revealing findings were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5.

A. NRC-Identified and Self-Revealing Findings

None

B. Licensee-Identified Violations

None

REPORT DETAILS

4. Other Activities

4OA5 Other Activities (TI 2515/191)

The objective of Temporary Instruction (TI) 2015/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans," is to verify that licensees have adequately implemented the mitigation strategies as described in the licensee's Final Integrated Plan, which was described in letters dated January 25, 2016, (ADAMS Accession No. ML 16033A353) and July 20, 2015, (ADAMS Accession No. ML 15205A342) and the NRC's plant safety evaluation (ADAMS Accession No. ML 16158A432) and to verify that the licensees installed reliable water-level measurement instrumentation in their spent fuel pools. The purpose of this TI is also to verify the licensees have implemented Emergency Preparedness (EP) enhancements as described in their site-specific submittals and the NRC's safety assessments, including multi-unit dose assessment capability and enhancements to ensure that staffing is sufficient and communications can be maintained during such an event.

The inspection verifies that plans for complying with NRC Orders EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (ADAMS Accession No. ML12054A736) and EA-12-051, Order Modifying Licenses With Regard to Reliable Spent Fuel Pool Instrumentation (ADAMS Accession No. ML12054A679) are in place and are being implemented by the licensee. Additionally, the inspection verifies implementation of staffing and communications information provided in response to the March 12, 2012, request for information letter and multiunit dose assessment information provided per COMSECY-13-0010, Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned, dated March 27, 2013, (ADAMS Accession No. ML12339A262).

The team discussed the plans and strategies with plant staff, reviewed documentation, and where appropriate, performed plant walk downs to verify that the strategies could be implemented as stated in the licensee's submittals and the NRC staff prepared safety evaluation. For most strategies, this included verification that the strategy was feasible, procedures and/or guidance had been developed, training had been provided to plant staff, and required equipment had been identified and staged. Specific details of the team's inspection activities are described in the following sections.

1. Mitigation Strategies for Beyond-Design Basis External Events

a. Inspection Scope

The team examined the licensee's established guidelines and implementing procedures for the beyond-design basis mitigation strategies. The team assessed how the licensee coordinated and documented the interface/transition between existing off-normal and emergency operating procedures with the newly developed mitigation strategies. The team selected a number of mitigation strategies and conducted plant walkdowns with licensed operators and responsible plant staff to assess: the adequacy and completeness of the procedures; familiarity of operators with the procedure

objectives and specific guidance; staging and compatibility of equipment; and the practicality of the operator actions prescribed by the procedures, consistent with the postulated scenarios. The team verified that a preventive maintenance program had been established for the Diverse and Flexible Coping Strategies (FLEX) portable equipment and that periodic equipment inventories were in place and being conducted. Additionally, the team examined the introductory and planned periodic/refreshers training provided to the Operations and Security staff most likely to be tasked with implementation of the FLEX mitigation strategies. The team also reviewed the introductory and planned periodic training provided to the Emergency Response Organization personnel. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors verified that the licensee satisfactorily implemented appropriate elements of the FLEX strategy as described in the plant specific submittals and the associated safety evaluation and determined that the licensee was generally in compliance with NRC Order EA-12-049. The inspectors verified that the licensee satisfactorily:

- developed and issued FLEX Support Guidelines (FSG) to implement the FLEX strategies for postulated external events.
- integrated the FSGs into existing plant procedures such that entry into and departure from the FSGs were clear when using existing plant procedures.
- protected FLEX equipment from site-specific hazards.
- developed and implemented adequate testing and maintenance of FLEX equipment to ensure its availability and capability.
- trained the staff to assure personnel proficiency in the mitigation of beyond-design-basis events.
- developed means to ensure that the necessary off-site FLEX equipment would be available from off-site locations.

The inspectors verified that noncompliances with the current licensing requirements, and other issues identified during the inspection, were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

2. Spent Fuel Pool Instrumentation

a. Inspection Scope

The team examined the licensee's newly installed spent fuel pool instrumentation. Specifically, the inspectors verified the sensors were installed as described in the plant-specific submittals and the associated safety evaluation and that the cabling for the power supplies and the indications for each channel were physically and electrically separated. Additionally, environmental conditions and accessibility of the instruments were evaluated. Documents reviewed are listed in the attachment.

b. Assessment

Based on samples selected for review, the inspectors determined that the licensee satisfactorily installed and established control of the spent fuel pool (SFP) instrumentation as described in the plant specific submittals and the associated safety evaluation and determined that the licensee is generally in compliance with NRC Order EA-12-051. The inspectors verified that the licensee satisfactorily:

- installed the SFP instrumentation sensors, cabling and power supplies to provide physical and electrical separation as described in the plant specific submittals and safety evaluation.
- installed the SFP instrumentation display in the location, environmental conditions and accessibility as described in the plant specific submittals.
- trained their staff to ensure personnel proficiency with the maintenance, testing, and use of the SFP instrumentation.
- developed and issued procedures for maintenance, testing, and use of the reliable SFP instrumentation.

The inspectors verified that noncompliances with the current licensing requirements, and other issues identified during the inspection, were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

3. Staffing and Communication Request for Information

a. Inspection Scope

Through discussions with plant staff, review of documentation and plant walkdowns, the team verified that the licensee had implemented required changes to staffing, communications equipment and facilities to support a multi-unit extended loss of offsite power scenario as described in the licensee's staffing assessment and the NRC safety assessment. The team also verified that the licensee had implemented dose assessment (including releases from spent fuel pools) capability using the licensee's site-specific dose assessment software and approach as described in the licensee's multi-unit dose assessment submittal. Documents reviewed are listed in the attachment.

b. Assessment

The inspectors reviewed information provided in the licensee's multi-unit dose submittal and in response to the NRC'S March 12, 2012, request for information letter and verified that the licensee satisfactorily implemented enhancements pertaining to Near-Term Task Force Recommendation 9.3 response to a large scale natural emergency event that resulted in an extended loss of all alternating current power (ELAP) to the site and impedes access to the site. The inspectors verified the following:

- Licensee satisfactorily implemented required staffing changes to support an ELAP scenario.

- EP communications equipment and facilities were sufficient for dealing with an ELAP scenario.
- Implemented dose assessment capabilities (including releases from spent fuel pools) using the licensee's site-specific dose assessment software and approach.

The inspectors verified that noncompliances with the current licensing requirements, and other issues identified during the inspection, were entered into the licensee's corrective action program.

c. Findings

No findings were identified.

4OA6 Exit

Exit Meeting Summary

On March 16, 2017, the inspectors presented the inspection results to Mr. R. Simmons and other members of the site staff. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel:

F. Mladen, Site Vice President
R. Simmons, Plant Manager
R. Johnson, Operations Manager
T. Shell, Assistant Operations Manager
H. Johnson, Superintendent of Shift Operations
J. Rosenberger, Site Engineering Director
J. Henderson, Manager of Design Engineering
J. Holloway, Engineering Supervisor
E. Turko, Engineering Supervisor
D. Lawrence, Director of Nuclear Safety and Licensing
L. Baker, Manager of Nuclear Training
B. Garber, Licensing Manager
L. Helstosky, Licensing Engineer
D. Aitken, Licensing Engineer
A. Elms, FLEX Program Manager
K. Rowland, General Project Manager

NRC personnel:

E. Andrews, Acting Senior Resident Inspector

LIST OF REPORT ITEMS

Opened and Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Procedures

0-AP-10.15, Loss of the 428 / 469 Line (with 11 Attachments), Revision 29
0-OP-ZZ-021, Severe Weather Preparation, Revision 17
0-AP-37.01, Abnormal Environmental Conditions, Revision 69
0-ICP-FC-L-105-1, Spent Fuel Pool Level (1-FC-L-105-1) Calibration, Revision 4
0-ICP-FC-L-105-2, Spent Fuel Pool Level (1-FC-L-105-2) Calibration, Revision 5
0-NSP-ZZ-002, Inspection of FLEX Equipment, Revision 7
0-NSP-ZZ-003, Inventory of BDB FLEX Equipment, Revision 3
0-NSP-ZZ-004, Annual Testing of BDB Rapidcase Satellite Communications, Revision 1
0-MPM-1960-01, Semi-Annual or Annual Test of BDB Flex Equipment, Revision 6
0-MPM-1960-02, Annual Testing of BDB Support Equipment, Revision 1
0-MPM-1960-02, Annual Testing of BDB Support Equipment, Revision 2
0-FSG-5, Initial Assessment and Flex Equipment Staging, Revision 3
0-FSG-11, Alternate SFP Makeup and Cooling, Revision 2
1-AP-10.27, Loss of All AC Power While on RHR, Revision 2
1-AP-27.00, Loss of Decay Heat Removal Capability, Revision 27
1-ECA-0.0, Loss of All AC Power, Revision 41
1-FSG-1, Long Term RCS Inventory Control, Revision 1
1-FSG-2, Alternate AFW Suction Source, Revision 1
1-FSG-3, Alternate Low Pressure Feedwater, Revision 1
1-FSG-4, ELAP DC Bus Load Shed/Management, Revision 1
1-FSG-6, Alternate ECST Makeup, Revision 1
1-FSG-7, Loss of Vital Instrumentation or Control Power, Revision 0
1-FSG-8, Alternate RCS Boration, Revision 1
1-FSG-9, Low Decay Heat Temperature Control, Revision 0
1-FSG-10, SI Accumulator Isolation, Revision 0
1-FSG-12, Alternate Containment Cooling, Revision 0
1-FSG-13, Transition From FLEX Equipment, Revision 0
1-FSG-14, Shutdown RCS Makeup, Revision 1
1-FSG-15, 4160 VAC Generator Connection and Operation, Revision 0
2-AP-10.27, Loss of All AC Power While on RHR, Revision 0
2-AP-27.00, Loss of Decay Heat Removal Capability, Revision 27
2-ECA-0.0, Loss of All AC Power, Revision 40
2-FSG-1, Long Term RCS Inventory Control, Revision 1
2-FSG-2, Alternate AFW Suction Source, Revision 1
2-FSG-3, Alternate Low Pressure Feedwater, Revision 1
2-FSG-4, ELAP DC Load Shed/Management, Revision 0
2-FSG-6, Alternate ECST Makeup, Revision 1
2-FSG-7, Loss of Vital Instrumentation and Control Power, Revision 0
2-FSG-8, Alternate RCS Boration, Revision 1
2-FSG-9, Low Decay Heat Temperature Control, Revision 2
2-FSG-10, SI Accumulator Isolation, Revision 1
2-FSG-12, Alternate Containment Cooling, Revision 0
2-FSG-13, Transition From FLEX Equipment, Revision 0
2-FSG-14, Shutdown RCS Makeup, Revision 1
2-FSG-15, 4160 VAC Generator Connection and Operation, Revision 0
CM-AA-400, 10 CFR 50.59 and 10 CFR 72.48 – Changes, Tests, and Experiments, Revision 7
CM-AA-BDB-10, Beyond Design Basis FLEX Program, Revision 3
CM-AA-BDB-101, Beyond Design Basis FLEX Program Maintenance, Revision 5
CM-AA-BDB-102, Beyond Design Basis FLEX Equipment Unavailability Tracking, Revision 8

DNES-AA-GN-1003, Design Effects and Considerations, Revision 18
 EPIP-4.03, Dose Assessment Team Controlling Procedure, Revision 18 Drawings
 1301042-1-E-001, Master Diagram, Spent Fuel Pool Instrumentation, Surry Power Station – Unit 1, Revision 1
 11448-LP-1S14, Lighting Panelboard Schedule 01-EP-LP-1S14, Surry Power Station – Unit 1, Revision 9
 1301019-2-S-001, Installation/Fabrication Sketch Switchgear Receptacle Enclosure 2-BDB-DB-03, Surry Power Station – Unit 2, Revision 3
 1301019-1-S-001, Installation/Fabrication Sketch Switchgear Receptacle Enclosure 2-BDB-DB-03, Surry Power Station – Unit 1, Revision 3
 1301019-11448-FE-18HT, Wiring Diagram, BDB Receptacle Panel 01-BDB-DB-3, Surry Power Station Unit – 1, Revision 3
 1301019-11448-FE-13A, Wiring Diagram, Lighting Distribution, Surry Power Station Unit – 1, Revision 2
 1301019-11448-FE-18HR, BDB Distribution Panelboard Schedule 01-BDB-DB-1, Surry Power Station Unit – 1, Revision 3
 1301019-11448-FE-11D, Wiring Diagram Vital Bus Distribution Panels 1-IA & 1-IIIA, Surry Power Station Unit – 1, Revision 2
 1301019-11448-FE-11E, Wiring Diagram Vital Bus Distribution Panels 1-IIA & 1-IVA, Surry Power Station – Unit 1, Revision 2
 1301019-11448-FE-18HS, BDB Distribution Panelboard Schedule 01-BDB-DB-2, Surry Power Station Unit – 1, Revision 2
 1301019-11448-FE-11B, Wiring Diagram Vital Bus Distribution Panels 1-II & 1-IV, Surry Power Station Unit – 1, Revision 2
 1301019-11448-FE-11A, Wiring Diagram Vital Bus Distribution Panels 1-I & 1-III, Surry Power Station Unit – 1, Revision 2
 1301019-11448-FE-1L, 480V One Line Diagram, Surry Power Station Unit – 1, Revision 0
 1301019-11448-FE-1M, 480V One Line Diagram, Surry Power Station Unit – 1, Revision 0

Modifications

Design Change SU-13-00015, BDB Storage Building, Surry Power Station, Units 1&2
 Design Change Update 15-0002, BDB Storage Building, Surry Power Station, Units 1&2
 Design Change SU-13-01042, Beyond Design Basis Spent Fuel Pool Level Instrument Installations, Revision 12
 Design Change Update SU-13-01042-007, Beyond Design Basis Spent Fuel Pool Level Instrument Installation

Calculations

Breaker Coordination Curve for 120/240V BDB panels (Pages from Calculation EE-864)
 Power Cable Details for DC-SU-13-01019, Cable Sizing and Voltage Drop, (Pages from Calculation EE-864 Rev. 3 Attachment 13.2)

Condition Reports Reviewed

1019843	1055894	1054005	1041144	1042352	1029092	1015131

Condition Reports Generated as part of the Inspection

1062547, Unterminated Cable in U1 ECST Valve Vault
 1062548, Review Cables in U2 ECST Valve Vault (Extent of Condition for CR1062547)
 1062544, Drawing Error on Project Drawing 1301042-1-E-001

Work Orders

WO 38103535843, Loop Calibration on Support of DC SU-13-01042
 WO 38103535844, Loop Calibration on Support of DC SU-13-01042
 WO 38103707237, Perform Level Loop Calibration
 WO 38103707242, Perform Level Loop Calibration
 WO 38103693824, 00-BDB-P-2C-Unit FTPM: Perform Annual Test and Inspections, dated April 6, 2016
 WO 38103693856, 00-BDB-P-3A-Unit FTPM: Perform Annual Test and Inspections, dated March 22, 2016
 WO 38103693864, 00-BDB-P-3B-Unit FTPM: Perform Annual Test and Inspections, dated March 22, 2016
 WO 38103693856, 00-BDB-P-3A-Unit FTPM: Perform Annual Test and Inspections, dated March 22, 2016
 WO 38103693904, 00-BDB-GEN-2A-Unit FTPM: Perform Annual Test and Inspections, dated April 4, 2016
 WO 38103693912, 00-BDB-GEN-2B-Unit FTPM: Perform Annual Test and Inspections, dated April 4, 2016
 WO 38103693960, 00-BDB-GEN-1A-Unit FTPM: Perform Annual Test and Inspections, dated April 4, 2016
 WO 38103693976, 00-BDB-GEN-1C-Unit FTPM: Perform Annual Test and Inspections, dated April 4, 2016
 WO 38103693968, 00-BDB-GEN-1B-Unit FTPM: Perform Annual Test and Inspections, dated April 4, 2016
 WO 38103694016, 00-BDB-P-2B-Unit FTPM: Perform Annual Test and Inspections, dated April 11, 2016
 WO 38103694072, 00-BDB-P-1-Pump FTPM: Perform Annual Test and Inspections, dated March 22, 2016
 WO 38103694080, 01-FP-P-4-Pump FTPM: Perform Annual Test and Inspections, dated March 22, 2016
 WO 38103694128, 00-BDB-P-2A-Unit FTPM: Perform Annual Test and Inspections, dated April 11, 2016
 WO 38103694184, FTPM: Perform Annual Test and Inspections, dated June 10, 2016
 WO 38103694192, 00-BDB-LF-1A-LIGHT FTPM: Perform Annual Test and Inspections, dated June 10, 2016
 WO 38103694200, 00-BDB-LF-1B-LIGHT FTPM: Perform Annual Test and Inspections, dated June 10, 2016
 WO 38103732208, 365 Day Freq. PT: Annual Testing of BDB Rapidcase Satellite Communications, dated February 3, 2017

Other

Safety Evaluation Report - Surry Power Station Units 1 and 2 – Safety Evaluation Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 CAC nos. MF1002, MF1003, MF1004, and MF1005 dated August 4, 2016 ETE-CPR-2012-0011, Beyond Design Basis – FLEX Strategy Basis Document and Final Integrated Plan, Revision 7
 ETE-CPR-2012-0011, Beyond Design Basis – FLEX Strategy Basis Document and Final Integrated Plan, Revision 7, Attachment 1.
 ETE-CPR-2014-1010, Surry Power Station BDB Flex Validation for Time Sensitive Actions, Revision 1
 ETE-CPR-2012-0011, Attachment 1, SPS Flex Strategy Basis Document 10.7.3 Development Strategy BDB Fuel, Revision 7
 ETE-CPR-2012-0011, Attachment 1, Section 7.2.11, Strategies for Repowering Remote Monitoring Panel if Flooding of the ESGR Occurs, Revision 7

AREVA 51-9199717-015, National SAFER Response Center Equipment Technical Requirements, Revision 15

Letter of Agreement, Commonwealth of Virginia, Department of Emergency Management, dated August 15, 2016

NE-GL-0035S, PC-MIDAS Guideline, Rev. 9

NEI 12-01, Phase 2 Extended Loss of Alternating Current Power (ELAP) Emergency Response Organization (ERO) Staffing Analysis Report, Revision 1

NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Rev B1

SU-15-01084, BDB Flood Barriers, Revision 2

Annual Test and Inspection 00-BDB-Gen-1C-Unit 120-240DG, BDB 40kW 120/240 VAC Diesel Gen. 1C Preventive Work Order 38103693976 performed June 14, 2016

Annual Test and Inspection 00-BDB-Gen-1B-Unit 120-240DG, BDB 40kW 120/240 VAC Diesel Gen. 1B Preventive Work Order 38103693968 performed June 14, 2016

Annual Test and Inspection 00-BDB-Gen-1A-Unit 120-240DG, BDB 40kW 120/240 VAC Diesel Gen. 1A Preventive Work Order 38103693960 performed June 14, 2016

Annual Test and Inspection 00-BDB-Gen-2B-Unit 480V DG, Preventive Work Order 38103693912 performed June 15, 2016

Annual Test and Inspection 00-BDB-Gen-2A-Unit 480V DG, Preventive Work Order 38103693904 performed June 15, 2016

Simulator Scenario developed for ELAP demonstration dated March 17, 2017

Engineering Acceptance Test Procedure 0-NAT-E-003, Revision 2, Control Circuitry Checkout/Initial Energization of Electrical Equipment, U2 BDB 120/240V Backfeed Test, completed October 13, 2015

Engineering Acceptance Test Procedure 0-NAT-E-003, Revision 2, Control Circuitry Checkout/Initial Energization of Electrical Equipment, U2 DBD 480V BDB Backfeed Test, completed October 28, 2015

Engineering Acceptance Test Procedure 0-NAT-E-003, Revision 2, Control Circuitry Checkout/Initial Energization of Electrical Equipment, U1 BDB 120/240V Backfeed Test, completed May 16, 2015

Engineering Acceptance Test Procedure 0-NAT-E-003, Revision 2, Control Circuitry Checkout/Initial Energization of Electrical Equipment, U1 DBD 480V BDB Backfeed Test, completed May 16, 2015