



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

July 27, 2015

Mr. Bryan C. Hanson
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION – AUDIT OF EXELON'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. MF6056)

Dear Mr. Hanson:

In Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents and Access and Management System (ADAMS) Accession No. ML003741774), the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04 (ADAMS Accession No. ML003696998), "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

An audit of Oyster Creek Nuclear Generating Station's (OCNGS's) commitment management program was performed during April – May 2015. The NRC staff concludes, based on the audit, that OCNGS has put into operation an acceptable program for implementing and managing NRC commitments. Details of the audit are set forth in the enclosed audit report.

B. Hanson

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-3100 or John.Lamb@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb". The signature is fluid and cursive, with a large initial "J" and "L".

John G. Lamb, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:
Audit Report

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UNITED STATES
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML003741774), that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," (ADAMS Accession No. ML003696998) contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC. NEI-99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented. An audit of the Oyster Creek Nuclear Generating Station (OCNGS) commitment management program was performed at NRC Headquarters from April – May 2015, with a plant site visit during the period May 4 – 6, 2015. The audit reviewed commitments made since the previous audit that was issued on December 26, 2012 (ADAMS Accession No. ML12256A424).

NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.).

Enclosure

2.0 AUDIT PROCEDURE AND RESULTS

The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, (2) verification of the licensee's program for managing changes to NRC commitments, and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation. The audit also verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Commitments made in Licensee Event Reports or in response to Notices of Violation may be included in the sample, but the review will be limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications (TSs), and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The attached table contains a list of those documents that were selected for additional review during this audit.

The NRC staff found that the licensee's commitment tracking program had captured all the regulatory commitments that were identified by the NRC staff before the audit. The NRC staff also reviewed plant procedures, assessment recommendations, work orders, corrective actions, training, qualification certifications and action requests that had been initiated or revised as a result of commitments made by the licensee to NRC.

The program has a requirement that the licensee perform an annual review and assessment of site and corporate commitments. The most recent OCNGS 2014 annual review, dated December 19, 2014 (ADAMS Accession No. ML14365A259), was reviewed by the NRC staff. The 2014 annual review appeared thorough.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at OCNGS is contained in LS-AA-110 - Revision 9, and Revision 10, "Commitment Management." The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. The audit also verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

The NRC staff reviewed the licensee's procedure LS-AA-110, Revision 9 and Revision 10. Section 6.1 of the procedure lists NEI 99-04 as a reference. The NRC staff found that LS-AA-110 generally follows the guidance of NEI 99-04 and provides detailed instructions for making regulatory commitments, tracking regulatory commitments, annotating documents to provide traceability of commitments, and for making changes to commitments. Therefore, the NRC staff concludes that the procedure used by the licensee to manage commitments provides the necessary attributes for an acceptable commitment management program.

The NRC staff also reviewed documents that had been created or revised as a result of commitments made by the licensee to the NRC. The NRC staff noted that the revised documents have annotations referring to commitments as part of the commitment change control process. These annotations serve to prevent the commitments from inadvertently being deleted or altered without having gone through the commitment change process.

The NRC staff reviewed the following OCNGS procedures:

- OP-OC-108-109-1001, Revision 30, "Severe Weather Preparation T&RM for Oyster Creek."
- EP-AA-1010, Revision 10, "Radiological Emergency Plan Annex for Oyster Creek Station."
- Operations Plant Manual, "Module 42 – Secondary Containment System."
- Operations Plant Manual, "Module 32 – Primary Containment System."
- OP-AA-108-107-1001, Revision 2, "Station Response to Grid Capacity Conditions."
- OC-PSA-005.17, "Primary Containment Isolation System."
- OC-PSA-005.25, "Containment Vent System."

The NRC staff also reviewed the following documents:

- Action Request (AR) 01427154-80-00, "Continuation of Issue Report (IR) 1341028 Tracking Actions for NRC 50.54(f)."
- AR 01427154-81-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)."
- AR 01522111-60-00, "NRC Order EA-13-109 Hardened Containment Vents."
- AR 01522111-61-00, "NRC Order EA-13-109 Hardened Containment Vents."
- AR 01522111-62-00, "NRC Order EA-13-109 Hardened Containment Vents."
- AR 01522111-63-00, "NRC Order EA-13-109 Hardened Containment Vents."
- AR 01570792-58-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)."
- AR 01570792-59-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)."
- AR 01570792-60-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)."
- AR 02467424-01-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-02-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-03-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-04-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-05-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-06-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-07-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- AR 02467424-08-00, "Continue Action Tracking for IRs 1341028/1427154 - 50.54(f)."
- Work Order (WO) C2029852, "Fukushima DC-C Seismic Walkdown."

2.3 Review to Identify Misapplied Commitments

The commitments reviewed for this audit were also evaluated to determine if they had been misapplied. A commitment is considered to be misapplied if the action comprising the commitment was relied on by the NRC staff in making a regulatory decision such as a finding of public health and safety in an NRC safety evaluation associated with a licensing action. Reliance on an action to support a regulatory decision must be elevated from a regulatory commitment to a legal obligation (e.g., license condition, condition of a relief request, regulatory exemption limitation or condition). A commitment is also considered to have been misapplied if

the commitment involves actions that were safety significant (i.e., commitments used to ensure safety).

Each of the commitments selected for the audit sample were reviewed to determine if any had been misapplied. The audit did not reveal any misapplied commitments.

2.3.1 Review of Safety Evaluation Reports for Licensing Actions since the Last Audit to Determine if they are Properly Captured as Commitments or Obligations

In addition to the commitments selected for the audit sample, all license amendment safety evaluations, exemptions and relief request safety evaluations that have been issued for a facility since the last audit were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above.

A review of all the licensing actions since December 2012 did not reveal any misapplied commitments.

3.0 CONCLUSION

As discussed above, the licensee's procedure used to implement and manage commitments provides the necessary attributes for an acceptable commitment management program.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

David Helker
Richard Gropp
Mike McKenna

Principal Contributor: John G. Lamb

Date: July 27, 2015

Attachment:
Summary of Audit Results

TABLE – SUMMARY OF AUDIT RESULTS
LIST OF DOCUMENTS REVIEWED

Item	Source	Commitment	Timeframe	Comments
1	Fleet Amendment No. 281 for Staff Qualifications for Licensed Operators ML13079A372 6/20/13	There was no commitment.	N/A	None.
2	Amendment No. 282 for TSTF-522 ML14008A350 5/27/14	There was no commitment.	N/A	None.
3	Amendment No. 283 for Fleet ERO Requalification ML14226A940 12/24/14	There was no commitment.	N/A	None.
4	Amendment No. 284 for Fleet Revise Shutdown Margin ML14295A300 1/29/15	There was no commitment.	N/A	None.
5	Amendment No. 285 for Protective Measures ML14329A625 3/30/15	There was no commitment.	N/A	None.
6	Amendment No. 286 for Snubbers ML15040A721 4/3/15	There was no commitment.	N/A	None.
7	Relief Request No. I5R-05 for Expanded Applicability Code Case N-661-1 ML13092A401 4/18/13	There was no commitment.	N/A	None.
8	Relief Request No. I5R-01 ML13169A062 8/5/13	There was no commitment.	N/A	None.

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Item	Source	Commitment	Timeframe	Comments
9	Relief Request No. I5R-02 ML13175A100 8/5/13	There was no commitment.	N/A	None.
10	Relief Request I5R-07 ML13175A125 8/6/13	There was no commitment.	N/A	None.
11	Relief Request No. I5R-06 ML13175A111 8/7/13	There was no commitment.	N/A	None.
12	Exemption from Biennial Exercise ML13290A691 12/30/13	There was no commitment.	N/A	None.
13	LER for Loss of Offsite Power during Hurricane Sandy ML13004A111 12/27/12	There was no commitment.	N/A	None.
14	LER for Indications Identified in the Control Rod Drive Return Nozzle ML13025A082 1/7/13	There was no commitment.	N/A	None.
15	LER MCR HVAC System TS Violation ML13025A083 1/8/13	There was no commitment.	N/A	None.
16	Letter – Evacuation Time Estimated, Appendix E ML13024A209 1/23/13	There was no commitment.	N/A	None.
17	Letter – Fitness for Duty Annual Data Report ML13060A356 2/28/13	There was no commitment.	N/A	None.
18	Letter – RFO ISI Report ML130720540 3/1/13	There was no commitment.	N/A	None.
19	LER – Trip ML13108A130 4/8/13	There was no commitment.	N/A	None.

Item	Source	Commitment	Timeframe	Comments
20	LER – Control Rod Drive Return Nozzle Weld ML13128A068 4/30/13	There was no commitment.	N/A	None.
21	LER for Loss of Offsite Power during Hurricane Sandy ML13190A465 6/26/13	There was no commitment.	N/A	None.
22	Letter – Response to RIS 2013-06 ML13190A049 7/8/13	There was no commitment.	N/A	None.
23	LER - Trip ML13346A265 11/27/13	There was no commitment.	N/A	None.
24	LER – Trip ML14008A097 12/5/13	There was no commitment.	N/A	None.
25	LER Secondary Containment Integrity Inoperable ML14035A068 1/16/14	There was no commitment.	N/A	None.
26	Response to Bulletin 2012-01 ML14034A179 2/3/14	There was no commitment.	N/A	None.
27	LER – Trip ML14051A545 2/6/14	There was no commitment.	N/A	None.
28	LER – Trip ML14055A320 2/12/14	There was no commitment.	N/A	None.
29	LER – RPS Actuation ML14070A446 2/14/14	There was no commitment.	N/A	None.
30	Letter – Fitness for Duty Annual Data Report ML14058A714 2/27/14	There was no commitment.	N/A	None.
31	LER – RPS Actuation ML14118A166 4/11/14	There was no commitment.	N/A	None.

Item	Source	Commitment	Timeframe	Comments
32	Response to Bulletin 2012-01 ML14120A271 4/30/14	There was no commitment.	N/A	None.
33	LER – 2 EMRVs inoperable ML14302A071 10/8/14	There was no commitment.	N/A	None.
34	LER – EDGs ML14325A598 11/11/14	There was no commitment.	N/A	None.
35	LER – Local Leak Rate Test ML14332A092 11/17/14	There was no commitment.	N/A	None.
36	LER Secondary Containment Integrity Inoperable ML14337A045 11/18/14	There was no commitment.	N/A	None.
37	AR 01427154-80-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)"	By letter dated September 16, 2013 (ML13260A083), Exelon submitted proposed resolution for completion of the seismic walkdowns. Walkdown was performed on September 24, 2014, under Work Order C2029852-A01.	Complete. 12/19/14	None.
38	AR 01427154-81-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)"	As specified in the commitment, Exelon sent a letter to the NRC on February 27, 2015 (ML15070A021).	Complete. 2/27/15	None.
39	AR 01522111-60-00, "NRC Order EA-13-109 Hardened Containment Vents"	Exelon sent a letter to the NRC on November 25, 2014 (ML14329A263). Commitment: Oyster Creek will implement modifications for the Torus Hardened Containment Vent System (HCVS) Isolation valves V-23-15 and V-23-16.	Open. Due date: 9/28/16	None.
40	AR 01522111-61-00, "NRC Order EA-13-109 Hardened Containment Vents"	Exelon sent a letter to the NRC on November 25, 2014. Commitment: Oyster Creek procedure OP-OC-108-109-1001 will be revised to ensure the northeast corner of the Reactor Building near the HCVS manual valve station is clear of loose objects that could become wind-driven missiles.	Open. Due date: 9/28/16	None.

Item	Source	Commitment	Timeframe	Comments
41	AR 01522111-62-00, "NRC Order EA-13-109 Hardened Containment Vents"	Exelon sent a letter to the NRC on November 25, 2014. Commitment: Oyster Creek will develop procedures to use a hand held radiation monitor at the shield wall.	Open. Due date: 9/28/16	None.
42	AR 01522111-63-00, "NRC Order EA-13-109 Hardened Containment Vents"	Exelon sent a letter to the NRC on November 25, 2014. Commitment: Oyster Creek procedure OP-OC-108-109-1001 will be revised to ensure snow and ice removal plan is in place to provide access to the manual valve station for the HCVS located at the northeast corner of the Reactor Building.	Open. Due date: 9/28/16	None.
43	AR 01570792-58-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)"	As specified in the commitment, Exelon sent a letter to the NRC on December 19, 2014.	Complete. 12/19/14	None.
44	AR 01570792-59-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 31, 2014 (ML14090A241). Commitment: Oyster Creek will perform a high frequency confirmation evaluation in accordance with EPRI Report 1025287, Section 3.4.	Open. Due date: 12/19/19	None.
45	AR 01570792-60-00, "Continuation of IR 1341028 Tracking Actions for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 31, 2014. Commitment: Oyster Creek will perform an evaluation of safety significant low frequency susceptible structures, systems, or components in accordance with EPRI Report 1025287, Section 3.2.1.1.	Open. Due date: 12/19/19	None.
46	AR 02467424-01-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015 (ML15085A046). Commitment: OP-OC-108-109-1001, Attachments 1, 4, and 6 contain procedures for flooding due to heavy rains, snow melt, etc., and the installation of sand bags.	Open. Due date: 04/09/29	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.

Item	Source	Commitment	Timeframe	Comments
47	AR 02467424-02-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015. Commitment: Revised procedure OP-OC-108-109-1001 to have sand bags pre-staged at the entrances to Site Emergency Building and Turbine Building.	Open. Due date: 04/09/29	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.
48	AR 02467424-03-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015. Commitment: Revised procedure OP-OC-108-109-1001 to have additional sand bags pre-staged at the Administration Building and Material Warehouse to protect assets.	Open. Due date: 04/09/29	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.
49	AR 02467424-04-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015. Commitment: An assessment of the impact of hydrodynamic and debris loads was conducted under ECR OC-12-00578, Revision 01, Attachment 1. The assessment indicated that these loads are bounded by current licensing basis impact loads.	Open. Due date: 08/31/15	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.
50	AR 02467424-05-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015. Commitment: A structural analysis was conducted under AR 01539938 to evaluate an additional 1.5 feet of hydrostatic load on the Reactor Building, Turbine Building, Emergency Diesel Generator Building, pipe vault, pipe trench between the Turbine Building and Reactor Building, and Reactor Building south wall vaults. The results indicate that these structures have sufficient capacity to accommodate the additional hydrostatic load.	Open. Due date: 08/31/15	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.
51	AR 02467424-06-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	Exelon sent a letter to the NRC on March 12, 2015. Commitment: The Material Warehouse stores B.5.b pump for defense-in-depth. It is not needed for FLEX or flood mitigation.	Open. Due date: 08/31/15	This action is complete. The licensee stated that this AR will be closed out once items #52 and #53 are completed.
52	AR 02467424-07-00, "Continue Action Tracking for IRs 1341028/1427154 for	Exelon sent a letter to the NRC on March 12, 2015. Commitment: Conduct a site walkdown and review of plant records to identify other potential entry points for ingress of external floodwater into protected areas of the plant based on	Open. Due date: 08/31/15	None.

Item	Source	Commitment	Timeframe	Comments
53	NRC 50.54(f)" AR 02467424-08-00, "Continue Action Tracking for IRs 1341028/1427154 for NRC 50.54(f)"	the re-evaluated flood levels. Exelon sent a letter to the NRC on March 12, 2015. Commitment: Ensure the FLEX strategy can be implemented with the re-evaluated flood.	Open. Due date: 08/31/15	None.

B. Hanson

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-3100 or John.Lamb@nrc.gov.

Sincerely,

/RA/

John G. Lamb, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:
Audit Report

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