

Rec'd 6-19-78

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

June 15, 1978

Indiana & Michigan Electric Co.
and
Indiana & Michigan Power Co.
Donald C. Cook Nuclear Plant, Units 1 and 2
(Docket Nos. 50-315 and 50-316)

Dr. Ernst Volgenau
Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Dr. Volgenau:

This is in reply to your letter of May 30, 1978 and its three appendices referring to the results of an investigation conducted during December, 1977 and January, 1978, into the testing of electrical cables, connectors and penetrations at the Donald C. Cook Nuclear Plant, Units 1 and 2. No response to Appendix C of your letter is required. In response to Appendix B, enclosed herewith is a check in the amount of Ten Thousand Dollars (\$10,000.00). Our response to Appendix A follows.

With respect to the subject matter of the first allegation which related to electrical penetrations, our statement in the October, 1977 FSAR amendment that the penetrations had been tested "to the requirements of IEEE 323, Appendix A, Combined requirements of Tables A1 and A2" was a mistake. It resulted from a misunderstanding during a telephone conversation between a member of our electrical engineering division and an employee of the test laboratories of Conax Corporation. This misunderstanding was incorporated into a draft of our amendment submittal. Unfortunately it was not discovered in the course of the review of that draft prior to its finalization within AEP and its submittal to NRC. The second allegation in Appendix A related to the testing of instrument cable. Here too the draft of our October, 1977 submittal was prepared based on the results of testing (which,

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U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
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as NRC correctly observes, involved in one instance testing of cable materials versus the as-installed cable itself, and in another instance testing of 12-gauge control-size single conductor cable versus the as-installed 16-gauge quad configured instrument cable itself). and was not determined, during the review of that draft prior to its finalization within AEP and its submittal to NRC, to be an inappropriate or incorrect description of our test data. Thus we do not deny these two allegations. The events alleged did occur.

As we discussed during our meeting on April 12, 1978, our management at the highest levels of AEP and I&M Electric and I&M Power has involved itself directly to ensure that future submittals to NRC are completely accurate and sufficiently detailed. To this end, I personally have met at our offices in New York and at the Cook Plant with our cognizant engineers who have the responsibility to draft documents for submittal to NRC. They understand the importance of the information we provide to NRC and the need for unerring accuracy. Further, we have formally instituted, upon our new quality assurance manager's recommendation, a change in our procedures to directly involve quality assurance personnel in the review of materials proposed for submittal to NRC. Thus, in addition to the technical and administrative review formerly given drafts of submittals to NRC, under the modification an additional independent check of all such drafts by quality assurance personnel will be performed. A copy of our new procedure is enclosed for your information. Finally, we are undertaking a program for computerization of our commitments to NRC.

While we are proud of the excellent record we have established in connection with the design, construction and operation of the Donald C. Cook nuclear units, we appreciate the importance of complete accuracy and sufficient detail in all our submittals of technical information to NRC. While we are disappointed that the events discussed above ever transpired, we are dedicated to making them a trigger to ever better performance on our part. We assure you there will be no recurrence of such events.

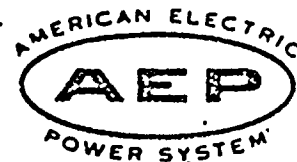
Very truly yours,
Indiana & Michigan Electric Co


John Fillingim
Vice President

JT:p
enc.. 2

cc: Mr. J. G. Keppler, USNRC Region III
enc. 1

AMERICAN ELECTRIC POWER SERVICE CORPORATION



ALL AEPSC Division
 Organization and Procedures Manual
General Section

Procedure No. 32-Preparation of
Submittals to the U.S. Nuclear
Regulatory Commission

REVISION RECORD

| Revision | Issue Date | Affected Pages | Approved By |
|----------|------------|----------------|------------------|
| 0 | 6/1/78 | Initial Issue | John Tillinghast |

AEPSC GENERAL PROCEDURE NO. 32
PREPARATION OF SUBMITTALS TO THE
U. S. NUCLEAR REGULATORY COMMISSION

INITIAL ISSUE

REVISION 0

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5/18/78

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Date:

5/23/78

AEPSC GENERAL PROCEDURE NO. 32
PREPARATION OF SUBMITTALS TO THE
U. S. NUCLEAR REGULATORY COMMISSION

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AEPSC GENERAL PROCEDURE . 32
PREPARATION OF SUBMITTALS TO THE
U. S. NUCLEAR REGULATORY COMMISSION

1.00 PURPOSE

- 1.01 To establish a mechanism for the preparation of submittals to the U. S. Nuclear Regulatory Commission (NRC)
- 1.02 Typical submittals covered by this procedure include, but are not limited to, the following (Action Item):
- Responses to NRC Office of Inspection and Enforcement Bulletins or Inspection Reports. (External)
 - FSAR or Technical Specification Changes.
 - Responses to NRC questions. (External)
 - Responses to special NRC Investigation reports. (External)
 - Commitments made verbally to the NRC. (External/Internal)
 - Transmittal of Vendor furnished information to the NRC, including where appropriate, AEPSC evaluation of said information. (External)
 - (External) - Cause for submittal generated by parties external to AEPSC. FSAR and/or Tech. Spec. changes can be generated by either external or internal causes.

2.00 POLICY

- 2.01 All submittals to the NRC, with the exception of those listed in Section 3.00 below, shall be prepared, reviewed, verified and approved in accordance with the procedure set forth below.
- 2.02 Departures from this procedure shall not be made without the express written consent of the AEPSC Vice Chairman, Engineering and Construction.

- 2.03 Commitments made verbally to the NRC, are a form of submittal. In all cases, such commitments should be prefaced with a statement to the effect that the verbal commitment is subject to AEP management concurrence before it can be considered a firm commitment. In most cases, verbal commitments will require a followup, written submittal to the NRC. (Ref. Section 4.02 below)
- 2.04 The preparation of submittals is to be assigned a high priority effort by all involved parties in order that submittal due dates are met. In the event of absence of key personnel, the responsible Supervisor shall take appropriate steps to assure that submittal preparation is not delayed.
- 2.05 The AEPSC Nuclear Safety and Licensing Section (NS & L) shall be responsible for the overall administration of the preparation of submittals to the NRC including assignment of responsibility for submittal draft preparation, input to commitment program, preparation of the management review copy of submittal, and final submittal.
- 2.06 The involved Supervisors shall be responsible for reviewing all draft submittals, prepared by their personnel, for technical accuracy and completeness.
- 2.07 AEPSC Quality Assurance shall be responsible for verifying that draft submittals are factual. The Plant Nuclear Safety Review Committee (PNSRC) shall be responsible for

2.07 (Cont'd)

verifying that Plant Operations, originated draft submittals are factual. The Site QA Coordinator shall be responsible for verifying that construction originated draft submittals are factual.

2.08 All "Action Items" whether NRC, Vendor or in-house initiated which require a submittal to the NRC shall be assigned a unique, identification number. Said identification shall be shown on all submittals to the NRC. (Ref. Sections 4.03.c & 4.09.b below)

2.09 This procedure is not intended to provide all of the detailed submittal preparation procedures for all involved parties. It shall be incumbent upon the involved AEPSC Engineering and Design Division, Plant Operations Departments, Plant Construction Departments, or others as may be or may become involved; to develop their own procedures in order to implement the requirements of this procedure.

3.00 EXCEPTIONS FROM THIS PROCEDURE

3.01 The following submittals to the NRC are exempt from the requirements of this procedure and are to be prepared and submitted in accordance with previously established procedures:

- a. Defect and non-compliance reporting as required by 10 CFR 21 (AEPSC General Procedure No. 31.)
- b. Licensee Event Reports (LER's).
- c. Special, plant-originated reports covering unusual

3.01 (Cont.)

Operating events that are not reported via the normal event reporting procedures.

4.00 SUBMITTAL PREPARATION PROCEDURE

4.01 GENERAL

4.01a The mechanism for preparation of submittals to the NRC is shown in Figure No. 1.

4.01b The Routing form GE.55 shown in Figure No. 2 shall be used for draft submittal preparation assignment and routing for review, approval, etc. AEPSC NS & L shall retain the original copy of the Routing Form which will become the "master" routing form for AEPSC QA verification and subsequent management review.

4.01c Each individual preparing a draft submittal shall attach to said draft, a copy of the NRC Submittal Source Document List Form GE.56 (Fig. No. 3) on which shall be listed all of the source documents (information sources) used in the preparation of the draft.

4.01d All Routing and Source Document Forms shall be attached to the "Acceptable Submittal Draft" Package by NS & L prior to forwarding to AEPSC QA for verification.

4.02 VERBAL COMMITMENTS TO THE NRC

4.02a Individuals making verbal commitments to the NRC shall document the details of all such commitments. Said documentation shall be done immediately upon making a verbal commitment and copies shall be sent to the Head, AEPSC NS & L Section and the AEPSC Manager of QA.

4.02b Upon receipt of verbal commitment documentation, the Head, NS & L Section shall review said commitment to ascertain whether a written submittal to the NRC is required.

Written submittals shall be prepared and processed in accordance with Section 4.03 thru 4.09 below.

4.02c Verbal commitments, not requiring a written submittal to the NRC shall be entered into the commitment program by NS & L and assigned to AEPSC QA for follow up to assure that the commitments are met.

4.03 DRAFT SUBMITTAL PREPARATION ASSIGNMENT.

4.03a In many cases, "Action Item" documents transmitted by the NRC include copies to several AEP Parties. The initial recipient of the "Action Item" shall cause copies to be sent, as a minimum, to the following parties unless said parties are designated for a copy by the original NRC transmittal:

- AEPSC Senior Vice President - Construction
- AEPSC Chief Nuclear Engineer
- Plant Manager
- Site Construction Manager - if item involves construction activities
- Head, AEPSC NS & L Section
- AEPSC Manager of Quality Assurance

The original copy of the "Action Item" documents shall be dispositioned as specified by the initial recipient.

4.03b The Head, AEPSC NS & L Section shall, immediately upon receipt of an "Action Item" document, assign said document to an NS & L Engineer for further assignment of submittal draft preparation responsibilities. Similarly, the AEPSC Manager of QA shall assign one of his staff to follow AEPSC submittal draft preparation.

4.03c The Head, NS & L, or his designated alternate, shall assign a unique, sequential identification number to each "Action Item" document. NS & L shall maintain a log of assigned identification numbers. The identification number shall be an alpha/numeric combination, eg: NRC - 00001.

4.03d The assigned NS & L engineer shall review the "Action Item" document and assign the responsibilities for preparation of draft submittals to the responsible AEPSC Cognizant Engineer(s), and/or Plant Manager(s) and/or Resident Engineer(s) (Construction) and/or other responsible parties including vendors. Said assignments shall be shown on the master copy of the routing form in the space provided.

4.03e The assigned NS & L engineer shall review all assignments for draft submittal preparation with the responsible parties and establish and document a schedule for draft and final submittal preparation. The schedule shall provide no less than one working day for execution of each of the activities described in Sections 4.06, 4.07b, 4.08 and 4.09 below. For those cases where the "Action Item" requires a response by a specific date (eg: 20 days from receipt of "Action Item", etc.), the schedule shall be developed to meet said date. In the event that the above review indicates that the "Action Item" response date cannot be met, the assigned NS & L engineer shall

advise the Head, NS & L Section and/or Chief Nuclear Engineer, and request that an extension be obtained from the originator of an "Action Item". If an extension is granted, the assigned NS & L engineer shall assure that the new submittal due date is met.

4.03f The assigned NS & L engineer shall forward a copy of the routing form and a complete copy of the "Action Item" document to the Section/Department Head and/or Plant Manager and/or Construction Manager, for review and work assignment. The assigned NS & L engineer shall be responsible for coordinating all aspects of submittal draft preparation by parties outside of AEPSC.

4.03g The assigned NS & L Engineer shall enter or cause to be entered, the assignment of submittal draft preparation responsibilities into the computerized commitment program.

4.04 DRAFT SUBMITTAL PREPARATION

4.04a Upon receipt of the documents described in 4.03f above, the Section/Department Head(s) and/or Plant Manager(s) and/or Construction Manager, shall review these documents and forward them to the assigned Cognizant Engineers and/or other responsible parties to initiate preparation of the required submittal draft.

4.04b Preparation of draft submittals is a high priority effort. Parties responsible for draft preparation shall assure that their draft meets the requirements of the "Action Item" document and that it is concise and technically complete and accurate.

4.04c The Preparer of a submittal draft shall document any criteria, procedures, techniques, etc. that were established to obtain information used in the preparation of a submittal draft. Said documentation shall be retained in the preparers files and be readily retrievable for use during the Verification portions of this procedure.

4.04d The Preparer of a submittal draft shall complete and attach to his draft, a copy of the NRC Submittal Source Document List, (SSDL) Form No. GE.56. The SSDL shall list all of the source documents (information sources) used by the preparer during the preparation of the draft submittal. The SSDL will reference each source document to the appropriate sections of the draft for which it is a source, the identification of the source document and its current location.

4.04e Upon completion of the preparation of a draft submittal, the preparer shall forward the draft and SSDL to his Section/Department Head for review and approval.

4.05. SUPERVISORY REVIEW AND APPROVAL

4.05a Draft submittals shall be reviewed and approved by the Preparers Section or Department Head, as a minimum. The Section/Department Head shall review the submittal draft to assure that it is technically accurate and complete, and that where applicable, established criteria were adhered to during preparation of the draft.

4.05b Additional supervisory review and approval shall be in accordance with requirements as established by individual AEPSC Division Heads, Plant Manager(s), and Site Construction Manager(s).

4.05c Upon completion of the review set forth in 4.05a, the Section/Department Head shall sign and date the Routing Form in the space provided.

4.05d Submittal drafts originated within AEPSC are to be routed after Supervisory review and approval to the assigned AEPSC NS & L engineer. Site originated submittal drafts are to be routed in accordance with Section 4.06 below.

4.06 SITE ORIGINATED DRAFT SUBMITTAL VERIFICATION

4.06a Draft submittals originated in Plant Operations or Site Construction Departments shall be forwarded to the PNSRC or Site QA Coordinator, as applicable, for verification.

4.06b The PNSRC or Site QA Coordinator or a designated alternate, as applicable, shall verify that any criteria, procedures, techniques, etc., established for use during the development of the submittal draft were adhered to. Sufficient review shall be made to assure that the submittal draft is complete and addresses the "Action Item" document requirements and that the submittal factually reflects the conditions as they exist at the time of verification. Statement of actions taken or proposed will be verified to assure that said actions were in fact taken, or that the schedule for implementation of proposed actions is realistic.

Verification shall be made that the source documents listed on the SSDL are readily retrievable and a sample checked to assure that the information in said documents was translated correctly in the draft submittal.

4.06c Any anomalies discovered in the submittal draft during verification shall be noted on the draft and the draft returned to the responsible supervisor for revision and resubmittal in accordance with Sections 4.05 and 4.06 above.

4.06d PNSRC or Site QA verification shall be indicated by a signature and date in the space provided on the Routing Form.

4.06e Upon completion of PSNRC or Site QA verification, submittal drafts, including SSDL's are to be routed to the assigned AEPSC NS & L engineer.

4.07 AEPSC NUCLEAR ENGINEERING DIVISION REVIEW.

4.07a The assigned NS & L engineer shall review all submittal drafts and prepare a draft, in proposed final format, for internal Nuclear Engineering Division review. In the case where the final submittal requires input from several parties, the NS & L engineer will prepare a combined submittal draft incorporating all of the involved drafts.

4.07b The proposed final submittal draft, including all SSDL's, shall be routed to the following parties within the Nuclear Engineering Division for review and approval:

1. Head, NS & L Section
2. Assistant Head, Nuclear Engineering Division
3. Chief Nuclear Engineer

4.07c Once an acceptable, proposed final draft submittal is developed, the draft including all SSDL's shall be routed to the AEPSC Manager of Quality Assurance for verification.

4.08 AEPSC QUALITY ASSURANCE VERIFICATION

- 4.08a The AEPSC Manager of QA, or his designated alternate, shall verify that any criteria, procedures, techniques, etc., established for use during the development of AEPSC-originated submittal drafts were adhered to. Sufficient review shall be made to assure that the draft is complete and addresses the "Action Item" document requirements; and that the submittal factually reflects the conditions as they exist or will exist at the time the submittal is made to the NRC. Statements of actions taken or proposed will be verified to assure that said actions were, in fact, taken, or that the schedule for implementation of proposed action is realistic. Verification shall be made that the source documents listed on the SSDL, for AEPSC-originated drafts, are readily retrievable and a sample checked to assure that the information in said documents was translated correctly to the draft submittal.
- 4.08b Any anomalies discovered in the draft during verification shall be noted on the draft and the draft returned to the assigned NS & L engineer for revision and resubmittal in

accordance with Section 4.07 and 4.08 above.

4.08c AEPSC QA verification shall be indicated by a signature and date in the space provided on the Routing Form.

4.08d Upon completion of the AEPSC QA verification, the proposed final submittal draft shall be routed to the assigned NS & L engineer.

4.09 FINAL SUBMITTAL PREPARATION, REVIEW AND TRANSMITTAL TO THE NRC

4.09a Upon receipt of the final submittal draft from AEPSC QA, the assigned NS & L engineer shall prepare the submittal in final format for transmittal to the NRC.

4.09b The assigned NS & L engineer shall assure that the submittal or submittal transmittal letter bears the same "Action Item" identification number as assigned in Section 4.03c above. In the case where more than one submittal is transmitted in response to an "Action Item", the submittals shall bear the same identification number and be sequentially suffixed as follows:

| | | |
|----------------------------|---|------------|
| Action Item Identification | = | NRC-00001 |
| 1st submittal | = | NRC-00001A |
| 2nd submittal | = | NRC-00001B |

4.09c The assigned NS & L engineer shall route the submittal, in final format, as designated on the Routing Form GE.55.

4.09d Each reviewer shall signify his concurrence with the submittal by crossing off his name and signing and dating the form in the space provided.

4.09e Upon completion of the review, all submittals, with the exception of submittals to NRC Regional Offices, must be signed by an Officer of the licensee company and notarized if required. Submittals to NRC Regional Offices must be signed by the AEPSC Senior Executive Vice President - Engineering or an Officer of the licensee company.

4.09f The signer of a submittal shall return the signed submittal to the Head NS & L Section.

4.09g The Head, NS & L shall cause the submittal to be transmitted to the NRC, and assure that designated copies are distributed.

4.09h The Head, NS & L shall enter, or cause to be entered, into the commitment program, all commitments made in the submittal to the NRC.

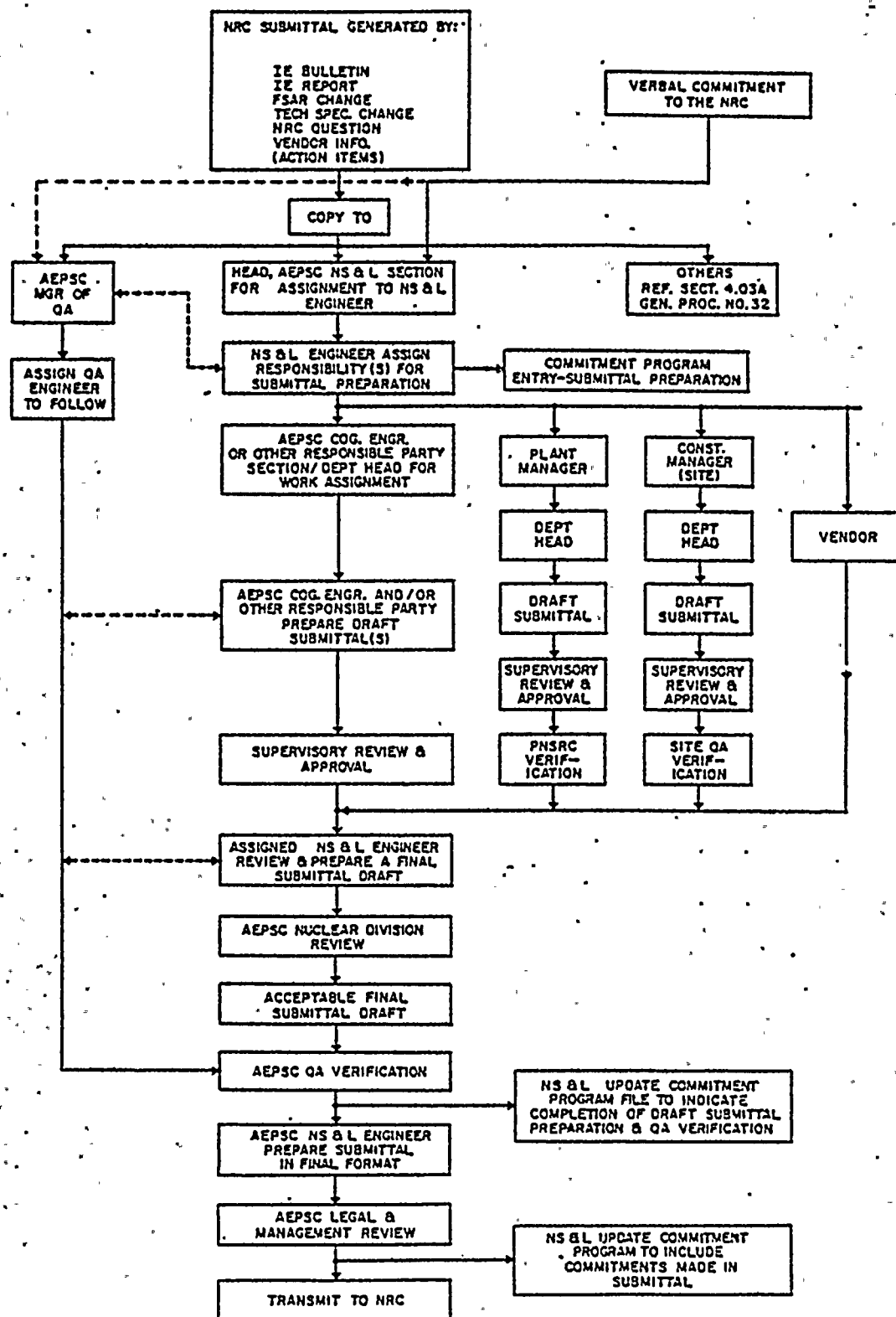
5.00 PROCEDURE REVISION

5.01 AEPSC Quality Assurance shall prepare and issue all revisions to this procedure.

5.02 All revisions to this procedure shall be reviewed by the following:

- AEPSC Manager of Quality Assurance
 - Head - AEPSC Nuclear Safety and Licensing Section
 - Chief Nuclear Engineer
 - AEPSC Senior Vice President, Construction
 - AEPSC Senior Executive Vice President, Engineering
- and approved by:
- AEPSC Vice Chairman - Engineering and Construction.

- 5.03 All temporary Changes to New Requirements for (interim changes) or Temporary Waiver of and/or part of this procedure shall be made using Form GE.27.E "Procedure Temporary Sheet" and Form GE.27.E1 - "Procedure Temporary Sheet - Continuation".
- 5.04 All Procedure Temporary Sheets are to be filed with this procedure until such time as they are cancelled, expire or are incorporated into a permanent revision of this procedure.
- 5.05 All revisions covered by Procedure Temporary Sheets, except for Temporary Waivers, shall be incorporated into each permanent revision of this procedure..



ACTION ITEM IDENT. NO.
NRC-

SUBJECT

NRC SUBMITTAL
DUE DATE

HEAD NS&L DATE REC'D.: DATE ASSIGN: ASSIGN TO:

B

DRAFT SUBMITTAL PREPARATION ASSIGNMENT BY NS&L ENGINEER

| NAME | ACTION ITEM | NAME | ACTION ITEM | NAME | ACTION |
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C

SECTION/DEPT. HEAD DATE REC'D. DATE ASSIGN. ASSIGN TO:

D

SUPERVISORY REVIEW & APPROVAL

E

PNSRC/SITE QA VERIFICATION

SECTION/DEPT. HEAD DATE OTHER DATE SIGNATURE

E

ASSIGNED NS&L ENGR.

DATE DRAFT REC'D.

DATE ROUTED FOR NE DIV. REVIEW

AEPSC NUCLEAR DIVISION REVIEW

1. HEAD, NS&L

DATE

DATE

2. ASST. DIV. HEAD

DATE

DATE

3. CHIEF NUCLEAR ENGR.

DATE

DATE

4. ASSIGNED NS&L ENGR.

☐ REVIEW & TYPE☐ REVISE, REDRAFT, RESUBMIT

H

AEPSC QA VERIFICATION

AEPSC MGR. OR QA

DATE REC'D.

SIGNATURE

DATE

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ASSIGNED NS&L ENGR.

DATE REC'D.

DATE ROUTED FOR MGT. REVIEW

E

AEPSC MANAGEMENT REVIEW

5. LEGAL

1. HEAD, NS&L

SIGNATURE

DATE

SIGNATURE

DATE

2. ASST. DIV. HD. NE DIV.

SIGNATURE

DATE

6. SUBMITTAL SIGNATURE

a. JOHN E. DOLAN

INITIALS

3. CHIEF, NUCLEAR ENGINEER

SIGNATURE

DATE

OTHER

INITIALS

4. AEPSC MGR. OF QA

SIGNATURE

DATE

b. OFFICER OF LICENSEE

JOHN TILLINGHAST

INITIALS

OTHER

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K

HEAD NS&L

NOTARY

DATE

DATE OF SUBMITTAL LETTER TO NRC

AEPSC General Procedure
No. 32 Figure No. 2

FILE NO.: JUN 01 197

3

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