

NSP**Regulatory Docket File****NORTHERN STATES POWER COMPANY**

MINNEAPOLIS, MINNESOTA 55401

May 4, 1976

Mr Victor Stello, Director
Division of Operating Reactors
U S Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr Stello



MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Revisions to Report of Conformance to 10CFR50, Appendix J,
and License Amendment Request dated January 30, 1976

Ref: (a) Letter from L O Mayer to K R Goller, USNRC, dated September 19, 1975

(b) Monticello License Amendment Request dated January 30, 1976

Reference (a) was our initial report of areas of nonconformance with 10CFR50, Appendix J, testing requirements at the Monticello Nuclear Generating Plant. Reference (b) was a License Amendment Request revising the Monticello Technical Specification to conform to Appendix J. Evaluation of our ability to conduct testing in accordance with the Regulation has been continuing following submittal of these documents. As a result, a number of changes have been identified which should be made to them. These changes are required for one or more of the following reasons:

- a. To correct an error in the initial document
- b. To remove inconsistencies between the initial document and planned submittals of requests for exemptions from the requirements of Appendix J and planned modifications to permit testing in accordance with Appendix J
- c. To include the recently installed Nitrogen Recirculation System

Attached are 40 copies of a revision to Reference (a) and 40 copies of a revision to Reference (b). None of these changes affect the intent or the substance of the original submittals.

Yours very truly,

L O Mayer, PE
Manager, Nuclear Support Services

LOM/DMM/de's

cc: J G Kopper
G Charnoff
MPCA
Attn: J W Ferman

MECCA
Attn: H J Vogel
City of St. Paul
Attn: D L Ficker
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Revision to letter dated September 19, 1975 from Mr L O Mayer, NSP to Mr K R Goller, USNRC, "Monticello Compliance with the Requirements of 10CFR50, Appendix J"

Replace Table 2 of the September 19, 1975 letter with the attached revised Table 2. Changes in the original table are indicated with lines in the margin.

The following additional containment penetrations, which have been construed to require testing in accordance with Appendix J, are not testable. Refer to Table 2.

<u>Description</u>	<u>Type Test</u>	<u>Reason Not Testable</u>
X-20 Demin Water Supply	C	No test connection
X-21 Service Air Suppl.	C	No test connection
X-29E Drywell Pressure & Sensing Lines X-29F	B	No provision for testing
X-32C Drywell Flood Level Sensing Line	B	No provision for testing
X-50E Drywell Pressure & Sensing Lines X-50F	B	No provision for testing
X-206A Torus Instrumentation thru X-206D	B	No provision for testing
X-209A Torus Instrumentation thru X-209D	B	No provision for testing
X-229B Instrument Air to Torus	C	No test connection

It has also been determined that there are several cases where primary containment isolation valves are leakage tested with the inboard valve pressurized in a direction opposite to the direction of pressurization following an accident.

Test connections at Monticello have generally been provided in the connecting volume between the inboard and outboard isolation valves. The connecting volume is pressurized and the pressure decay rate is measured. In some cases there is no other provision for testing the inboard isolation valve.

The following penetrations can only be tested with at least one valve subjected to pressure in the opposite direction (refer to Table 2):

		<u>Type Valve</u>
X-18	Floor Sump	Globe
X-19	Equip Sump	Globe
X-25	Drywell Vent	Butterfly
X-26	Drywell Vent	Butterfly
X-27D	O ₂ Analyzer	Globe
X-27E	O ₂ Analyzer	Globe
X-27F	O ₂ Analyzer	Globe
X-39A	Drywell Spray B	Gate - Wedge Type
X-39D	Drywell Spray A	Gate - Wedge Type
X-41	Coolant Sample	Globe
X-48	N ₂ Pumpback	Globe
X-205	Torus Vent	Butterfly
X-214	O ₂ Analyzer	Globe
X-220	O ₂ Analyzer	Globe

Except in the case of penetration X-39A and X-39B, testing of these valves in the reverse direction is permissible under the provisions of Section XI, Subsection IWV, of the ASME Code.

Table 2 Monticello Containment Penetrations

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Penetration Designation	Description	Applicable Appendix J T ₁ & Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
-	Seismic Restraint Port A	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port B	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port C	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port D	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port E	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port F	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port G	B - Section II.G.1	-	1	Yes	-	-	-
-	Seismic Restraint Port H	B - Section II.G.1	-	1	Yes	-	-	-
-	Drywell Head	B - Section II.G.1	-	1	Yes	-	-	-

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Table 2 Monticello Containment Penetrations

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Penetration Designation	Description	Applicable Appendix J Test Type	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-1	Equipment Hatch	B - Section II.G.1	-	-	-	-	1	Yes
X-2	Air Lock	B - Section II.G.2	-	-	-	-	-	Yes
X-3	Not Assigned	None	-	-	-	-	-	-
X-4	Head Access Hatch	B - Section II.G.1	-	-	-	-	1	Yes
X-5A - 5H	Drywell-Torus Vent Pipes	None (Note 7)	-	-	-	-	-	-
X-6	CRD Access Hatch	B - Section II.G.1	-	-	-	-	1	Yes
X-7A	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
X-7B	Primary Steam Line A	C - Section II.H.4 (Note 1)	AO-2-80A	3	Yes	AO-2-86A	3	Yes
	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
X-7C	Primary Steam Line B	C - Section II.H.4 (Note 1)	AO-2-80B	3	Yes	AO-2-86B	3	Yes
	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
X-7D	Primary Steam Line C	C - Section II.H.4 (Note 1)	AO-2-80C	3	Yes	AO-2-86C	3	Yes
	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
X-8	Primary Steam Line D	C - Section II.H.4 (Note 1)	AO-2-80D	3	Yes	AO-2-86D	3	Yes
	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Primary Steam Drain	C - Section II.H.4	MO-2373	4	Yes	MO-2374	4	Yes

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Table 2 Monticello Containment Penetrations

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-9A	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Feedwater Line	C - Section II.H.4	FW-97-2	5	Yes	FW-94-2	5	Yes
X-9B	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Feedwater Line	C - Section II.H.4	FW-97-1	5	Yes	FW-94-1	5	Yes
X-10	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Steam to RCIC	C - Section II.H.4	MO-2075	4	Yes	MO-2076	4	Yes
X-11	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Steam to HPCI	C - Section II.H.4	MO-2034	4	Yes	MO-2035	4	Yes
X-12	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	RHR Supply	C - Section II.H.3	MO-2029	4	Yes	MO-2030	4	Yes
X-13A	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	LPCI to B Loop	C - Section II.H.3	AO-10-46B	6	Yes	MO-2015	4	Yes
X-13B	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	LPCI to A Loop	C - Section II.H.3	AO-10-46A	6	Yes	MO-2014	4	Yes
X-14	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	RWCU Supply	C - Section II.H.2	MO-2397	4	Yes	MO-2398	4	Yes
X-15	Spare Penetration	None	-	-	-	-	17	-

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Table 2 Monticello Containment Penetrations

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-16A	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Core Spray B	C - Section II.H.3	AO-14-13B	6	Yes	MO-1754	4	Yes
X-16B	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Core Spray A	C - Section II.H.3	AO-14-13A	6	Yes	MO-1753	4	Yes
X-17	Bellows	B - Section II.G.1	-	-	-	-	2	Yes
	Head Cooling	C - Section II.H.2	MO-2027	4	Yes	MO-2026	4	Yes
X-18	Floor Sump Discharge	C - Section II.H.2	-	-	-	AO-2541A	7	Yes
						AO-2541B	7	Yes
X-19	Equip Sump Discharge	C - Section II.H.2	-	-	-	AO-2561A	7	Yes
						AO-2561B	7	Yes
X-20	Demin Water Supply	C - Section II.H.1	-	-	-	DM-57	8	No
						DM-58	8	No
X-21	Service Air Supply	C - Section II.H.1	-	-	-	AS-39	3	No
						AS-40	8	No
X-22	Instrument Air	C - Section II.H.3	-	-	-	CV-1478	9	No
X-23	RBCCW to Drywell	C - Section II.C.3	-	-	-	RBCC-15	5	No
X-24	RBCCW from Drywell	C - Section II.C.3	-	-	-	MO-1426	4	No

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-25	Drywell Ventilation Exhaust	C - Section II.H.1	-	-	-	AO-2386	10	Yes
						AO-2387	10	Yes
						CV-2389	9	Yes
X-26	Drywell Ventilation Supply	C - Section II.H.1	-	-	-	AO-2377	10	Yes
						AO-2381	10	Yes
						CV-3268	9	Yes
						CV-3269	9	Yes
X-27A - 27C	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-27D	Oxygen Analyzer Sample Point	C - Section II.H.1	-	-	-	CV-3305	9	Yes
						CV-3306	9	Yes
X-27E	Oxygen Analyzer Sample Point	C - Section II.H.1	-	-	-	CV-3307	9	Yes
						CV-3308	9	Yes
X-27F	Oxygen Analyzer Sample Point	C - Section II.H.1	-	-	-	CV-3309	9	Yes
						CV-3310	9	Yes

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-28A - 28F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-29A - 29D	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-29E - 29F	Instrumentation	B - Section II.G.4 (Note 8)	-	-	-	-	19	No
X-30A - 30F	Spare Penetrations	None	-	-	-	-	17	-
X-31A,B,D,E,F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-31C	Spare Penetration	None	-	-	-	-	17	-
X-32A,B,D,E,F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-32C	Drywell Flood Level Sw	B - Section II.G.4 (Note 8)	-	-	-	-	19	No
X-33A - 33F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-34A - 34F	Spare Penetrations	None	-	-	-	-	17	-
X-35A,B,C	TIP Probes (Note 4)	C - Section II.H.2	-	-	-	TIP 1,2,3	15	No
X-35D	Spare Penetration	None	-	-	-	-	17	-
X-35E	TIP Purge Supply	C - Section II.H.2	-	-	-	Purge Check	5	No
						Purge SV	16	No

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-36	CRD Hydraulic Return	C - Section II.H.2	CRD-34	5	No	CRD-31	5	Yes
X-37A	12 Recirc Seal Inj	C - Section II.H.3	XR-27-2	5	Yes	XR-26-2	5	Yes
X-37A - 37D	CRD Insert Lines	None (Note 5)	-	-	-	-	-	-
X-38A	11 Recirc Seal Inj	C - Section II.H.3	XR-27-1	5	Yes	XR-26-1	5	Yes
X-38A - 38D	CRD Withdraw Lines	None (Note 5)	-	-	-	-	-	-
X-39A	Drywell Spray B	C - Section II.H.1	-	-	-	MO-2021	4	Yes
			-	-	-	MO-2023	4	Yes
X-39B	Drywell Spray A	C - Section II.H.1	-	-	-	MO-2020	4	Yes
						MO-2022	4	Yes
X-40AA - 40DF	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-41	Recirc Loop B Sample	C - Section II.H.2	CV-2790	9	Yes	CV-2791	9	Yes
X-42	Standby Liquid Control	C - Section II.H.2	XP-7	5	No	XP-6	5	Yes
X-43 - 47	Spare Penetrations	None	-	-	-	-	17	-
X-48	N ₂ Pumpback Suction	C - Section II.H.1	-	-	-	CV-7436	9	Yes
						CV-7437	9	Yes
X-49A - 49F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-50A - 50D	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-50E - 50F	Instrumentation	B - Section II.G.4 (Note 8)	-	-	-	-	19	No
X-51A - 51F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-52A - 52F	Instrumentation	None (Note 3)	-	-	-	-	18	-
X-53 - X-99	Not Assigned	None	-	-	-	-	-	-

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-100A - 100D	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes
X-100E	Spare Penetration	None	-	-	-	-	17	-
X-101A, 101C	Spare Penetrations	None	-	-	-	-	17	-
X-101B, 101D	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes
X-102	Spare Penetration	None	-	-	-	-	17	-
X-103	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes
X-104A - 104D	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes
X-104E	Spare Penetration	None	-	-	-	-	17	-
X-105A, 105C, 105D	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes
X-105B	Spare Penetration	None	-	-	-	-	17	-
X-106	Spare Penetration	None	-	-	-	-	17	-
X-107	Spare Penetration	None	-	-	-	-	17	-
X-108 - X-199	Not Assigned	None	-	-	-	-	-	-
X-200A	Torus Hatch (45°)	B - Section II.G.1	-	-	-	-	1	Yes
X-200B	Torus Hatch (225°)	B - Section II.G.1	-	-	-	-	1	Yes
X-201A - 201H	Torus Vent Pipes	None (Note 7)	-	-	-	-	-	-
X-202A, B, C, D, E, F, G, H, J, K	Drywell-Torus Vacuum Breakers	None (Note 7)	-	-	-	-	-	-

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-202I	Not Assigned	None	-	-	-	-	-	-
X-203	Not Assigned	None	-	-	-	-	-	-
X-204A - 204D	Torus Ring Header	None (Note 7)	-	-	-	-	-	-
X-205	Torus Ventilation Exhaust and Supply to Nitrogen Recirculation System	C - Section II.H.1	-	-	-	AO-2383	10	Yes
						CV-2384	9	Yes
						CV-7440	9	Yes
						AO-285	10	Yes
X-206A - 206D	Torus Instrumentation	B - Section II.G.4 (Note 8)	-	-	-	-	19	No
X-207A - 207H	Torus Vent Pipe Drains	None (Note 7)	-	-	-	-	-	-
X-208A - 208H	Relief Valve Discharge Pipes	None (Note 7)	-	-	-	-	-	-
X-209A - 209D	Torus Instrumentation	B - Section II.G.4 (Note 8)	-	-	-	-	19	No
X-210A	RHR and Core Spray B Test Line to Torus	None (Note 9)	-	-	-	RHR-8-2	5	-
						MO-2007	4	-
						MO-2009	12	-
						MO-1750	12	-
						CS-10-2	13	-

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-210B	RHR and Core Spray A Test Line to Torus	None (Note 9)	-	-	-	RHR-8-1	5	-
			-	-	-	MO-2006	4	-
			-	-	-	MO-2008	12	-
			-	-	-	MO-1749	12	-
			-	-	-	CS-10-1	13	-
X-211A	RHR B Torus Spray	C - Section II.H.1	-	-	-	MO-2007	4	No
			-	-	-	MO-2009	12	No
			-	-	-	MO-2011	12	No
X-211B	RHR A Torus Spray	C - Section II.H.1	-	-	-	MO-2006	4	No
			-	-	-	MO-2008	12	No
			-	-	-	MO-2010	12	No
X-212	RCIC Turbine Exhaust	C - Section II.H.1	-	-	-	RCIC-9	5	Yes
X-213A, 213B	Flanged Bottom Torus Drains	None (Note 10)	-	-	-	-	-	-
X-214	Oxygen Analyzer Return	C - Section II.H.1	-	-	-	CV-3313	9	Yes
			-	-	-	CV-3314	9	Yes
X-215 - 216	Spare Penetrations	None	-	-	-	-	17	-
X-217	HPCI Exhaust Vac Bkr	None (Note 11)	-	-	-	-	-	-

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-218	Torus-Reactor Building Vacuum Breakers	C - Section II.H.1	-	-	-	AO-2379	10	YES
						DWV-8-2	14	YES
						AO-2380	10	YES
						DWV-8-1	14	YES
X-219	RCIC Exhaust Vac Bkr	None (Note 11)	-	-	-	-	-	-
X-220	Oxygen Analyzer Sample Point	C - Section II.H.1	-	-	-	CV-3311	9	Yes
						CV-3312	9	Yes
X-221	HPCI Turbine Exhaust	C - Section II.H.1	-	-	-	HPCI-9	5	Yes
X-222	HPCI Steam Line Drains	None (Note 9)	-	-	-	HPCI-14	5	-
						HPCI-15	5	-
X-223	RCIC Steam Line Drains	None (Note 9)	-	-	-	RCIC-16	5	-
						RCIC-17	5	-
X-224A	RHR B Suction	None (Note 9)	-	-	-	MO-1987	4	-
X-224B	RHR A Suction	None (Note 9)	-	-	-	MO-1986	4	-
X-225	HPCI Suction	None (Note 9)	-	-	-	MO-2061	4	-
						MO-2062	4	-

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Penetration Designation	Description	Applicable Appendix J Type Test	INNER BARRIER			OUTER BARRIER		
			Designation	Type	Tested?	Designation	Type	Tested?
X-226A	Core Spray B Suction	None (Note 9)	-	-	-	MO-1742	4	-
X-226B	Core Spray A Suction	None (Note 9)	-	-	-	MO-1741	4	-
X-227	RCIC Suction	None (note 9)	-	-	-	MO-2100	4	-
X-228	Not Assigned	-	-	-	-	-	-	-
X-229 A, X-229C - 229K	Spare Penetrations	None	-	-	-	-	17	-
X-229B	Instrument Air to Torus	C - Section II.H.1	-	-	-	CV-7956	9	No
X-230	Electrical Penetration	B - Section II.G.1	-	-	-	-	11	Yes

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Explanation of Notes:

1. During refueling outages, when the vessel head is removed, MSIV's are tested by pressurization between valves. Since test pressure tends to unseat the inboard valve, a lower test pressure than P_a is specified.
2. Isolation is accomplished using manual valves in the containment supply line. These valves are opened only when containment integrity is not required. The valves are closed in accordance with valve lineup checklists which are completed prior to plant heatup.
3. One-inch instrumentation lines equipped with excess flow check valves. Subject to leakage testing in accordance with Technical Specification 4.7.D.1.b. Leakage can occur only through rupture of the line or its associated instrument outside of containment.
4. TIP probes are withdrawn on a containment isolation signal and the line is isolated by automatic closure of a ball valve. A shear valve can be manually actuated from the Control Room in the event a probe fails to retract. A solenoid valve in the purge supply line automatically closes on a containment isolation signal.
5. Containment isolation of the CRD hydraulic control lines is accomplished with a ball check valve internal to each drive mechanism and the normally closed hydraulic system control valve.
6. The drywell air lock is constructed with both doors opening inward so that containment pressure will tend to seat the door seals. During overall air lock pressure tests, a support member is installed on the inner door to prevent the door from being forced open.
7. These are internal penetrations between sections of the containment structure.
8. Instrumentation lines not equipped with excess flow check valves. Leakage can occur only through rupture of the line or its associated instrument outside of containment.
9. This penetration terminates at the bottom of the suppression pool. It is not exposed to the containment atmosphere.
10. These drains are installed at the bottom of the suppression pool.
11. The HPCI and RCIC steam exhaust line vacuum breaker penetrations utilize the HPCI and RCIC steam exhaust line check valves for containment isolation.

Barrier Type Codes

- | | |
|----|---|
| 1 | Double gasketed seal |
| 2 | Hot pipe expansion bellows |
| 3 | Air operated globe valve |
| 4 | Motor operated gate valve |
| 5 | Check valve |
| 6 | Testable check valve |
| 7 | Air operated gate valve |
| 8 | Manual gate valve |
| 9 | Diaphragm air operated control valve |
| 10 | Air operated butterfly valve |
| 11 | Electrical penetration |
| 12 | Motor operated globe valve |
| 13 | Manually operated globe valve |
| 14 | Self-actuating vacuum breaker |
| 15 | Ball Valve |
| 16 | Solenoid Valve |
| 17 | Spare Penetration - welded cap |
| 18 | Instrument Line with excess flow check valve |
| 19 | Instrument Line without excess flow check valve |

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Revision to License Amendment Request Dated January 30, 1976

Replace Exhibits A and B in their entirety with the attached revised Exhibits A and B.
Changes in the Exhibit A are indicated with lines in the margin.