

15548

RELATED CORRESPONDENCE

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USNRC

August 8, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'94 AUG -9 P2:54

Before the Atomic Safety and Licensing BoardOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

Docket Nos. 50-424-OLA-3

GEORGIA POWER COMPANY,)

50-425-OLA-3

et al.)

Re: License Amendment

(Vogtle Electric Generating)

(Transfer to Southern

Plant, Units 1 and 2))

Nuclear)

ASLBP No. 93-671-01-OLA-3

GEORGIA POWER COMPANY'S THIRD SUPPLEMENTAL
RESPONSE TO ALLEN L. MOSBAUGH'S THIRD SET OF
INTERROGATORIES AND REQUEST FOR DOCUMENTS

I. INTRODUCTION

Georgia Power Company ("GPC") hereby provides a supplemental response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents to Georgia Power, dated May 17, 1994 (the "Third Request"). Specifically, this response provides the additional information required by the Licensing Board's Memorandum and Order (Motion to Compel), dated July 14, 1994.

II. SUPPLEMENTAL INTERROGATORY RESPONSES

A. Interrogatory 2

(Aufdenkampe, Bockhold, Stringfellow) GPC is not aware of the presence of any nonspeaking witnesses to the portion of the April 19, 1990 telephone conference call referenced in Intervenor's original interrogatory.

D503

B. Interrogatory 4

(Burr, Stokes) GPC believes that, with one clarification, its prior response to Intervenor's interrogatory¹ continues to be appropriate based on the new definitions supplied in Intervenor's Motion to Complete Responses to Intervenor's Third Set of Interrogatory Questions and Document Request, dated June 22, 1994, at 4. The term "returned to service" used in NUREG-1410, Appendix J, at J-3, is not defined therein and GPC does not know what the NRC's definition of that term was. GPC believes the only reasonable definition for the term is the same point in time as defined by the term "declared operable."

C. Interrogatory 6

(Burr, Stokes) Attached is a table which identifies instances where GPC obtained an unsatisfactory dew point reading on the Vogtle emergency diesel generator (EDG) air supply system.² The table also notes the corrective actions taken of which GPC is aware. Dew point measurements were taken by Instrument and Control (I&C) technicians, as noted on the attached table, who were supervised by the I&C Superintendent, Mr. Mike Hobbs or Mr. Mark Briney.³ The I&C Superintendent reported to the Maintenance

¹ See Georgia Power Company's Response to Allen L. Mosbaugh's Third Set of Interrogatories, response to Interrogatory 4 at 37.

² The Vogtle acceptance range for these dew point readings is 32°F to 50°F. While the table identifies all instances where the dew point measurements recorded on the referenced maintenance work orders ("MWOs") were outside this acceptance range, actual dew points below 32°F are not possible with the Vogtle refrigerant-type air dryers.

³ Mr. Hobbs, who was the Vogtle I&C Superintendent, assumed a temporary role within another Maintenance Department group from February 1990 through the end of 1990. Mr. Mark Briney, who is no longer a GPC employee, acted as the I&C Superintendent during this period.

Manager, Mr. Harvey Handfinger.⁴ Mr. Handfinger reported to the Assistant Plant General Manager-Operations, Mr. W. F. Kitchens. Mr. Kitchens reported to the General Manager, Mr. George Bockhold. GPC is unable to state with certainty each instance where a senior official, which GPC interprets to mean a Vice President or higher, received communications regarding an unsatisfactory dew point reading. However, the Vice President-Vogtle Project, Mr. Ken McCoy, and the Senior Vice President, Mr. George Hairston, both attended the April 9, 1990 meeting between GPC and NRC Region II officials in Atlanta, Georgia during which the unsatisfactory dew point readings on EDG 2A were apparently discussed. See Mr. Jim Bailey's Meeting Notes from the April 9, 1990 meeting (Bates No. 000696).

D. Interrogatory 7

(Burr, Stokes) GPC has reviewed every work order listed in the computer printout provided to Intervenor in GPC's original response to this question and concluded that the work order information does not discuss whether or not the compressor associated with each air dryer was in-service at the time the air dryer was removed from service for maintenance. GPC knows of no method to identify each occasion during 1989 and 1990 when this condition existed as requested by the Intervenor. GPC also knows of no method to identify who knew this condition existed even after applying the guideline established by the Board in its July 14, 1994 Memorandum and Order. GPC is not aware of any routine or special reports that would document this condition (thus, there are no supervisors or managers responsible for documenting such a condition). Furthermore, based on document reviews and discussions with current GPC employees, GPC is unaware of any instance where

⁴ Mr. Handfinger is no longer a GPC employee.

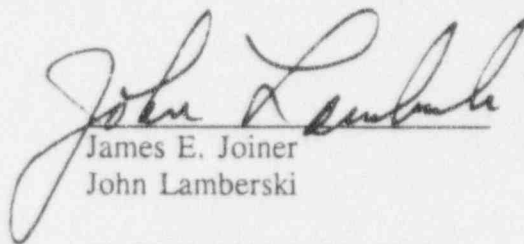
reviews and discussions with current GPC employees, GPC is unaware of any instance where this condition was noted and reported to senior officials.

Nevertheless, GPC believes there is a possible method to identify at least some of the information Intervenor seeks. It involves a two step approach. First, Intervenor can review the Unit Control Log for every day in 1989 and 1990 for entries related to air dryers and compressors being removed from service and then returned to service. This review is not likely to yield complete information because the Unit Control Log may not record every instance where such equipment is removed from and then returned to service. The task would involve a line-by-line review of thousands of pages of handwritten information. The Unit Control Logs for 1989 and 1990 are available to Intervenor for inspection and copying in the Atlanta, Georgia offices of GPC's counsel. Second, the Outside Area Operator Rounds Sheets, which GPC is producing pursuant to Intervenor's Fifth Interrogatory and Document Request To Georgia Power Company, dated August 8, 1994, includes a shift-by-shift check noting whether the EDG compressors are on. Intervenor may compare this information with the previously provided EDG air dryer maintenance work order ("MWO") information to identify instances where the air dryer may have been out of service while the associated compressor was in service. Of course, the air dryer MWO information does not necessarily reveal all time periods when the air dryer was out of service. GPC objects to conducting the research described above on the grounds that it is unduly burdensome and oppressive, and would require GPC to perform additional research and analyses which Intervenor is able to perform himself.

E. Interrogatory 15

(Ajluni) The "extent, purpose and methods" used by GPC to gather information about Intervenor were limited to inquiries concerning activities of Intervenor which relate to specific statements Intervenor made in support of his Intervention petition, including statements made by him or his counsel at the January 12, 1993 preliminary conference in Augusta, Georgia; the purpose of these limited inquiries was to determine the accuracy of these prior statements; and the methods employed were inquiries made by GPC counsel, and counsel's agents and employees.

Dated: August 8, 1994



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Counsel for Georgia Power Company

MWO	DATE	EDG/DRYER	DEWPOINT IN DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
18900984	03/16/89	1A/K01 1A/K02	22.8 20.1	D. ELWOOD	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER)
19000889	03/09/90	1A/K01 1A/K02	61 66	L. WILDER	RETESTED 3/12/90 K01 - 48 K02 - 45
19002662	06/09/90	1A/K01 1A/K02	12.9 -10.6	R. CULPEPPER	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) USED ROOT VALVES WHICH WAS DETERMINED TO REPRESENT A MORE CONSISTENT MOISTURE CONTENT. RETESTED: K01 - 34.6 K02 - 41.4
18902188	07/05/89	1A/K01	75	D. THOMPSON	REPLACED AIR DRYER. RETESTED: K02 - 48
19001513	03/31/90	1A/K01 1A/K02	80 90	M. WILKINS	CLEARED CONDENSING UNITS. MWO 19001651 INITIATED
19001651	04/05/90, 1800 EST 04/05/90, 2030 EST 04/06/90, 0005 EST 04/06/90, 0425 EST 04/06/90, 0930 EST 04/06/90, 1530 EST 04/06/90, 1700 EST	1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02 1A/K01 1A/K02	88, 78 67, 77 83 85 86 85 85 86 80 70 80 NONE TAKEN 76 NONE TAKEN 75, 15, 76 80, 33, 78	D. THAMES - - - - D. LOHRMAN - D. THAMES - - - - DUL 171	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) BLEW DOWN AIR RECEIVERS AND USED DIFFERENT TEST EQUIPMENT. RETESTED 4/8/90 K01 - 41.3 K02 - 36.2
18900822	02/21/89	1B/K01 1B/K02	19 19.1	J. STORM	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWO 18901086 INITIATED
18901086	03/08/90 03/22/90	1B/K01 1B/K02 1B/K01 1B/K02	-2 -12 -15 27	D. LOHRMAN	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWO 18902188 INITIATED
18903217	08/16/89	1B/K01 1B/K02	-20 -22	D. THAMES	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) CONVERTED READINGS PER CHART IN ALNOR MANUAL: K01 - 38 K02 - 41

MWNO	DATE	EDG/DRYER	DEWPOINT BY DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
19905009	11/13/89	18/R01 18/R02	-5 -10	B. ROUYER	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) CONVERTED READINGS PER CHART IN ALMOR MANUAL: K01 = 38 K02 = 32
19001770	04/06/90 04/07/90	18/R01 18/R02 18/R01 18/R02	84 82 85, 18, 80 76, 18, 82	D. THOMAS D. LOHRMAN	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) BLEW DOWN AIR RECEIVERS AND RETESTED 4/08/90 K01 = 44.5 K02 = 42.5
19001778	04/09/90	18/R01 18/R02	84 83	JEROME JACKSON	FOUND TEST EQUIPMENT OUT OF CALIBRATION, MWNO VOIDED, FOUND ACCEPTABLE ON 4/8/90 VIA MWNO 19001770
19004267 19004394	11/08/90 11/15/90	18/R02 18/R02	60, 64.4 82 80.2 70.8	B. BERRY B. BERRY	DRYER INOPERABLE REF. MWNO 19004394 REPLACED FAN MOTOR AND CONTROL BOX, PURGED RECEIVER TANK, RETESTED 11/23/90. K02 = 46.5
28902600	04/17/89	2A/R01 2A/R02	60.2 60.8	D. ELROD	NONE NOTED
28903959	06/21/89	2A/R01 2A/R02	-13.5 -11.5	J. ALLBROOK	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWNO 28904592 INITIATED
28904220	07/13/89	2A/R01 2A/R02	27.5 17.5	J. ALLBROOK	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) INCREASED RECEIVER PRESSURE TO 240 LBS. RETESTED: K01 = 35, K02 = 48
28904592	08/01/89	2A/R01 2A/R02	87 86	D. HINES	CONVERTED READING PER CHART IN ALMOR MANUAL: K01 = 49 K02 = 48
28908660	01/26/90	2A/R01 2A/R02	-01 -40	W. TEATER	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER)ELEVATED PRESSURE: K01 = 42 K02 = 44

MWO	DATE	EDG/DRYER	DEWPOINT IN DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
29000864	04/07/90	2A/K01	85.30, 82	N. LEFTWICH	[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] BLEW DOWN AIR RECEIVER AND CHECKED WITH DIFFERENT SENSOR
		2A/K02	69.8, 61.5 96.30, 85 84.1, 50.9		
	04/08/90	2A/K01	61.4, 80.9	B. BERRY	
		2A/K02	61.8		
	04/09/90	2A/K02	69.8, 61.5		
	04/10/90	2A/K01	64.1, 50.9		
		2A/K02	57.4, 57.2		
	04/11/90	2A/K01	62.6, 54.1		
	04/14/90	2A/K01	43.8		
		2A/K02	47.3		
29001786	06/07/90	2A/K01	6.4	R. CULPEPPER	[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] RECHECKED USING ROOT VALVES. K01 = 40.5 K02 = 44.3
		2A/K02	6.3		
29003203	08/10/90	2A/K02	64.5	M. JENNING	NONE [ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] FOUND ACCEPTABLE
29003648	08/25/90	2A/K02	26.9	L. WELDER	
29004070	10/05/90	2A/K01	74.1	D. AQUINDE	BLEW DOWN AIR RECEIVER AND RETESTED. K01 = 48.1 K02 = 48.7
		2A/K02	84.3		
29003608	09/01/90	2A/K02	64.5	R. DIXON	FOUND BLOWN FUSE ON DRYER. REPLACED FUSE. RETESTED 11/4/90 AND FOUND ACCEPTABLE.
28905790	11/16/89	2B/K01	17	J. BURROUGHS	
		2B/K02	-5		[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] RETESTED K01 = 34 K02 CONVERTED TO 36
28908193	12/05/89	2B/K01	7	D. PALMER	NONE [ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] USED PROPER CONVERSION CHART? K01 = 35 K02 = 50
		2B/K02	19		
29001021	04/06/90	2B/K01	76, -10, 85	N. LEFTWICH	[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] BLEW DOWN AIR RECEIVER AND RETESTED USING DIFFERENT SENSOR. K01 = 39.5 K02 = 44.6
		2B/K02	80, 10, 80		
29004432	10/10/90	2B/K01	74.8, 78.4	B. BERRY	SEE MWO 29004839
	10/11/90	2B/K01	78		
29004839	10/26/90	2B/K01	58.9	J. FAIRES	RETESTED USING DIFFERENT SENSOR: K01 = 38.4

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY, et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(Transfer to
Southern Nuclear)

ASLBP NO. 93-671-OLA-3

AFFIDAVIT OF MARK J. AJLUNI

I, Mark J. Ajluni, being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as Senior Project Engineer, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the response to Interrogatory No. 15.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Mark J. Ajluni
Mark J. Ajluni

Sworn to and subscribed
before me this 8 day
of August, 1994.

Ann Carter
Notary Public
My commission expires:
MY COMMISSION EXPIRES JANUARY 12, 1997

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
REPORT THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY, et al.

(Vogtle Electric Generating Plant,
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Docket Nos. 50-424-OLA-3
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Re: License Amendment
(Transfer to
Southern Nuclear)

ASLEY NO. 93-671-OLA-3


AFFIDAVIT OF JOHN G. AUFDENKAMPE

I, John G. Aufdenkampe, being duly sworn, state as follows:


1. I am currently employed by Southern Company Services as Design Team Leader, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the response to Interrogatory No. 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


John G. Aufdenkampe

Sworn to and subscribed
before me this _____ day
of August, 1994.


Notary Public
My commission expires:

~~EXPIRATION DATE: JANUARY 12, 1997~~

UNITED STATES OF AMERICA
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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Re: License Amendment
(Transfer to
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF GEORGE BOCKHOLD, JR.

I, George Bockhold, Jr., being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as General Manager, Nuclear Technical Support.
2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the response to Interrogatory No. 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

J Bockhold
George Bockhold Jr.

Sworn to and subscribed
before me this 8 day of
August, 1994.

George Carter
Notary Public
My commission expires:
MY COMMISSION EXPIRES JANUARY 12, 1997

August 8, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board


In the Matter of)	Docket Nos. 50-424-OLA-3
)	50-425-OLA-3
GEORGIA POWER COMPANY,)	
et al.)	Re: License Amendment
)	(Transfer to Southern
(Vogtle Electric Generating)	Nuclear)
Plant, Units 1 and 2))	
)	ASLBP No. 93-671-01-OLA-3

AFFIDAVIT OF KENNETH S. BURR

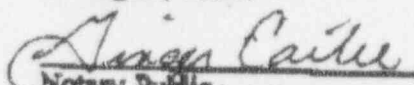
I, Kenneth S. Burr, being duly sworn, state as follows:

1. I am currently employed by the Southern Nuclear Operating Company, as Senior Project Engineer, Nuclear Maintenance and Support-Vogtle.
2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the responses to Interrogatory Nos. 4., 6. and 7.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


Kenneth S. Burr

Sworn to and subscribed
before me this 8 day
of August, 1994.


Notary Public
My commission expires:
MY COMMISSION EXPIRES JANUARY 12, 1997

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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Re: License Amendment
(Transfer to
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF N. JACKSON STRINGFELLOW

I, N. Jackson Stringfellow, being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as Senior Project Engineer - Vogtle Project Licensing.
2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the response to Interrogatory No. 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Sworn to and subscribed
before me this 8 day
of August, 1994.

Singer Carter
Notary Public
My commission expires:

MY COMMISSION EXPIRES JANUARY 12, 1997

N. Jackson Stringfellow
N. Jackson Stringfellow

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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Re: License Amendment
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ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF KENNETH C. STOKES

I, Kenneth C. Stokes, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Senior Engineer, Vogtle Electric Generating Plant.

2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the responses to Interrogatory Nos. 4., 6. and 7.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Kenneth C. Stokes
Kenneth C. Stokes

Sworn to and subscribed
before me this 8th day
of August, 1994.

Stephen J. [Signature]
Notary Public

My commission expires:

July 21, 1998

Notary Public, Richmond County, Georgia
My Commission Expires July 21, 1998



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
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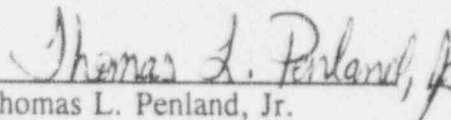
) Nuclear)

Plant, Units 1 and 2))

) ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

I hereby certify that copies of Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, dated August 8, 1994, were served by express mail upon the persons listed on the attached service list this 8th day of August, 1994.


Thomas L. Penland, Jr.

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* ASLBP No. 93-671-01-OLA-3

SERVICE LIST

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Commission

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Services Branch

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