

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket No. 50-277
50-278

License Nos. DPR-44
DPR-56

License Change Request
ECR 96-00627

"Surveillance Requirements for APRM Flow
Units and Associated Flow Transmitters"

Supporting information for changes - 3 pages

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.1.1.13 (continued)

Valve Fast Closure, Trip Oil Pressure—Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition, this SR is met and the channel is considered OPERABLE.

The Frequency of 24 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.17

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods (LCO 3.1.3), and SDV vent and drain valves (LCO 3.1.8), overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components will pass the Surveillance when performed at the 24 month Frequency.

SR 3.3.1.1.18

This SR ensures that the individual channel response times are maintained less than or equal to the original design value. The RPS RESPONSE TIME acceptance criterion is included in Reference 11.

RPS RESPONSE TIME tests are conducted on a 24 month Frequency. The 24 month Frequency is consistent with the PBAPS refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.1.1.9 and SR 3.3.1.1.14 (continued)

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components will pass the Surveillance when performed at the 24 month Frequency.

SR 3.3.1.1.10, SR 3.3.1.1.11, SR 3.3.1.1.12,
SR 3.3.1.1.15, and SR 3.3.1.1.16

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies that the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the current plant specific setpoint methodology. SR 3.3.1.1.16, however, is only a calibration of the radiation detectors using a standard radiation source.

As noted for SR 3.3.1.1.11 and SR 3.3.1.1.12, neutron detectors are excluded from CHANNEL CALIBRATION because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Changes in neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 1000 MWD/T LPRM calibration against the TIPS (SR 3.3.1.1.8). A second note is provided for SRs 3.3.1.1.11 and 3.3.1.1.12 that allows the APRM and IRM SRs to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM and IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads or movable links. This Note allows entry into MODE 2 from MODE 1, if the 184 day or 18 month Frequency is not met per SR 3.0.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. As noted for SR 3.3.1.1.10, radiation

(continued)

A third note is provided for SR 3.3.1.1.12 that excludes the APRM flow units and associated flow transmitters from this SR since the calibration requirement for these instruments is specified in SR 3.3.1.1.19.

Table 3.3.1.1-1 (page 1 of 3)
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OF OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux —High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.3 SR 3.3.1.1.5 SR 3.3.1.1.6 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 120/125 divisions of full scale
	5(a)	3	H	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 120/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.3 SR 3.3.1.1.17	NA
	5(a)	3	H	SR 3.3.1.1.4 SR 3.3.1.1.17	NA
2. Average Power Range Monitors					
a. Startup High Flux Scram	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.3 SR 3.3.1.1.6 SR 3.3.1.1.8 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 15.0% RTP
b. Flow Biased High Scram	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 0.66 W + 63.9% RTP(b)
c. Scram Clamp	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 118.0% RTP
d. Downscale	1	2	F	SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.17	≥ 2.5% RTP
e. Inop	1,2	2	G	SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.17	NA

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) $0.66 \text{ W} + 63.9\%$ - $0.66 \Delta \text{W RTP}$ when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.14 Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.15 Perform CHANNEL CALIBRATION.	24 months
SR 3.3.1.1.16 Calibrate each radiation detector.	24 months
SR 3.3.1.1.17 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.1.1.18 Verify the RPS RESPONSE TIME is within limits.	24 months

SR 3.3.1.1.19 Calibrate APRM flow units and associated flow transmitters. 24 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.1.1.10	<p>-----NOTE----- Radiation detectors are excluded. -----</p> <p>Perform CHANNEL CALIBRATION.</p>	92 days
SR 3.3.1.1.11	<p>-----NOTES----- 1. Neutron detectors are excluded. 2. Not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. -----</p> <p>Perform CHANNEL CALIBRATION.</p>	184 days
SR 3.3.1.1.12	<p>-----NOTES----- 1. Neutron detectors are excluded. 2. For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. -----</p> <p>Perform CHANNEL CALIBRATION.</p>	18 months
SR 3.3.1.1.13	Verify Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are not bypassed when THERMAL POWER is \geq 30% RTP.	24 months

(continued)

3. APRM flow units and associated flow transmitters are excluded.

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SR 3.3.1.1.19

The Average Power Range Monitor Flow Biased High Scram Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that the flow unit instrumentation that supplies the recirculation flow signal to the APRM system responds to the measured recirculation flow within the necessary range and accuracy by use of a standard pressure source. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations.

The Frequency of 24 months is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components will pass the Surveillance when performed at the 24 month Frequency.

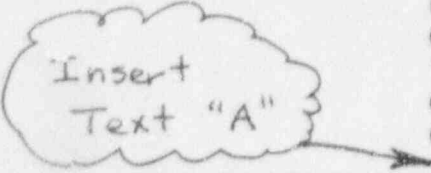
BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.3.1.1.18

This SR ensures that the individual channel response times are maintained less than or equal to the original design value. The RPS RESPONSE TIME acceptance criterion is included in Reference 11.

RPS RESPONSE TIME tests are conducted on a 24 month Frequency. The 24 month Frequency is consistent with the PBAPS refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.



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REFERENCES

1. UFSAR, Section 7.2.
2. UFSAR, Section Chapter 14.
3. NEDO-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.
4. NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," dated May 1993.
5. UFSAR, Section 14.6.2.
6. UFSAR, Section 14.5.4.
7. UFSAR, Section 14.5.1.
8. P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.
9. NEDO-30851-P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.
10. MDE-87-0485-1, "Technical Specification Improvement Analysis for the Reactor Protection System for Peach Bottom Atomic Power Station Units 2 and 3," October 1987.
11. UFSAR, Section 7.2.3.9.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.1.1.10, SR 3.3.1.1.11, SR 3.3.1.1.12,
SR 3.3.1.1.15, and SR 3.3.1.1.16 (continued)

are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Changes in neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 1000 MWD/T LPRM calibration against the TIPs (SR 3.3.1.1.8). A second note is provided for SRs 3.3.1.1.11 and 3.3.1.1.12 that allows the APRM and IRM SRs to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM and IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads or movable links. This Note allows entry into MODE 2 from MODE 1, if the 184 day or 18 month Frequency is not met per SR 3.3.1.1.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. A third note is provided for SR

3.3.1.1.12 that allows the APRM SR to be performed without entering the associated Conditions and Required Actions for up to six hours provided core flow is maintained at or above 82% where the APRM scram setpoint becomes clamped. Once core flow drops below 82%, and the APRM scram setpoints become flow biased, associated Conditions and Required Actions must be entered. As noted for SR 3.3.1.1.10, radiation detectors are excluded from CHANNEL CALIBRATION due to ALARA reasons (when the plant is operating, the radiation detectors are generally in a high radiation area; the steam tunnel). This exclusion is acceptable because the radiation detectors are passive devices, with minimal drift. The radiation detectors are calibrated in accordance with SR 3.3.1.1.16 on a 24 month Frequency.

excludes the APRM flow units and associated flow transmitters from this SR since the calibration requirement for these instruments is specified in SR 3.3.1.1.19.

The 92 day Frequency of SR 3.3.1.1.10 is conservative with respect to the magnitude of equipment drift assumed in the setpoint analysis. The Frequencies of SR 3.3.1.1.11 and SR 3.3.1.1.12 are based upon the assumption of a 184 day or an 18 month calibration interval, respectively, in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequencies of SR 3.3.1.1.15 and SR 3.3.1.1.16 are based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the applicable setpoint analysis.

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Table 3.3.1.1-1 (page 1 of 3)
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux —High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.3 SR 3.3.1.1.5 SR 3.3.1.1.6 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 120/125 divisions of full scale
	5(a)	3	H	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 120/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.3 SR 3.3.1.1.17	NA
	5(a)	3	H	SR 3.3.1.1.4 SR 3.3.1.1.17	NA
2. Average Power Range Monitors					
a. Startup High Flux Scram	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.3 SR 3.3.1.1.6 SR 3.3.1.1.8 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 15.0% RTP
b. Flow Biased High Scram	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 0.66 W + 63.9% RTP(b)
c. Scram Clamp	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 118.0% RTP
d. Downscale	1	2	F	SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.17	≥ 2.5% RTP
e. Inop	1,2	2	G	SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.17	NA

(continue)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.66 W + 63.9% = 0.66 ΔW RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.13 Verify Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are not bypassed when THERMAL POWER is \geq 30% RTP.	24 months
SR 3.3.1.1.14 Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.15 Perform CHANNEL CALIBRATION.	24 months
SR 3.3.1.1.16 Calibrate each radiation detector.	24 months
SR 3.3.1.1.17 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.1.1.18 Verify the RPS RESPONSE TIME is within limits.	24 months

SR 3.3.1.1.19 Calibrate APRM flow units and associated flow transmitters.

24 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.9 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.1.1.10 -----NOTE----- Radiation detectors are excluded. ----- Perform CHANNEL CALIBRATION.	92 days
SR 3.3.1.1.11 -----NOTES----- 1. Neutron detectors are excluded. 2. Not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ----- Perform CHANNEL CALIBRATION.	184 days
SR 3.3.1.1.12 -----NOTES----- 1. Neutron detectors are excluded. 2. For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. 3. For Function 2.b, until completion of refuel outage 2R11, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided core flow is maintained at or above 82%. This is an exception to Surveillance Requirements Note 2. ----- Perform CHANNEL CALIBRATION.	18 months

APRM flow units and associated flow transmitters are excluded.

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ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

License Change Request
ECR 96-00627

List of Attached Pages

Unit 2

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Unit 3

3.3-5
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B3.3-33
B3.3-35

APRM system provides monitoring and accident mitigation functions to limit peak flux in the core during Modes 1 and 2. No pressure boundary interfaces or process control parameters will be challenged in any way as to create the possibility of a new or different type of accident than any previously evaluated. Also, failure of the sensing line associated with flow transmitters to measure recirculation drive flow has already been accounted for in the initial plant design by including excess flow check valves for sensing line break isolation. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- iii) The proposed changes do not involve a significant reduction in a margin of safety because the APRM flow biased high flux scram is not credited in the PBAPS safety analysis. Because the proposed changes do not impact safety analysis assumptions, these proposed changes will not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this application because the changes conform to the criteria for "actions eligible for categorical exclusion," as provided for under 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed changes do not authorize any change in the authorized power level of the facility. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupation radiation exposure.

Conclusion

The Plant Operation Review Committee and the Nuclear Review Board have reviewed the proposed changes to the TS and have concluded that the changes do not involve an unreviewed safety question and will not endanger the public health and safety.

Changes are proposed to TSSR 3.3.1.1.12 and TS Table 3.3.1.1-1 and a new TSSR 3.3.1.1.19 is proposed to allow calibration of the APRM flow bias instrumentation during an outage and avoid the risk of a scram associated with on-line calibration. Associated Bases changes are also proposed.

Safety Assessment

The APRM flow biased high flux scram is not credited in the PBAPS safety analysis. The design basis for the APRM flow bias scram is to provide additional margin to the clamped high flux scram setpoint.

Implementation of the proposed TS changes will not impact the function of the APRM flow bias instrumentation. The new hardware employed in the APRM flow bias instrumentation has the documented performance characteristics necessary to accurately perform its design function on a 24 month calibration interval. The 24 month calibration interval would match the 24 month operating cycle. The calibrations can then be done between operating cycles and avoid the risk of an unnecessary scram.

Information Supporting a Finding of No Significant Hazards Consideration

The changes proposed in this application do not constitute a Significant Hazards consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the accidents previously evaluated take credit only for the clamped 120% high neutron flux scram setpoint. Credit is not taken for the flow biased APRM scram setpoint. Failure or inaccuracy of the flow biased feature of the APRM scram setpoint will in no way affect the clamped high flux scram setpoint. The 120% high flux scram setpoint is derived internal to the APRM circuitry and calibrated separately as part of the APRM trip circuitry. The APRM clamped high flux scram setpoint is not being impacted by the proposed changes and will be automatically enforced regardless of the status or accuracy of the APRM flow bias circuitry.

Because there is no impact on the clamped 120% high neutron flux scram setpoint which is the only APRM scram setpoint with any analytical safety basis, the proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

- ii) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not allow plant operation in any mode that is not already evaluated. The

PECO Energy Company (PECO Energy) requests that the Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3, be amended as proposed below for extending the surveillance interval for calibration of Average Power Range Monitor (APRM) flow bias instrumentation from 18 months to 24 months.

Provided below is a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The marked-up pages indicating the proposed changes are provided in Attachment 2.

We request that, if approved, the changes be effective by August 17, 1997. This date is the last day that the frequency for TS Surveillance Requirement (SR) 3.3.1.1.12 is met in accordance with TSSR 3.0.2 as measured from the previous performance.

Discussion and Description of the Proposed Changes

Calibration of APRM flow bias instrumentation is governed by TSSR 3.3.1.1.12. The frequency is specified as every 18 months. Because PBAPS utilizes 24 month operating cycles between refuelings, TSSR 3.3.1.1.12 is required to be performed on line. Performance of APRM flow bias instrumentation calibration on-line causes one complete division of APRMs to be inoperable during the course of the surveillance which is nominally four to six hours per division. This condition causes entry into TS Condition 3.3.1.1C which requires that Reactor Protection System (RPS) trip capability be restored within one hour. In order to restore RPS trip capability for the flow bias instrumentation, the ARM division undergoing test must be placed in a tripped condition which results in a half scram. Having the plant in a half scram condition for this period of time is undesirable due to the risk of perturbations on the opposite RPS channel causing a full scram that challenges equipment and operations personnel.

The APRM safety design basis does not require the flow biasing signal to fulfill its purpose. Furthermore, the Updated Final Safety Analysis Report accident and transient analyses do not take credit for the flow bias function in the mitigation of any accidents or transients.

The APRM flow bias instrumentation has recently been upgraded. The original equipment has been replaced with new equipment that exhibits performance characteristics that enable it to operate for 24 months between calibration checks. The assessment is based on actual 24 month calibration interval results; therefore, no extrapolation of data is necessary. This assessment is based on a review of PBAPS historical, 24 month interval calibration data of components identical to, or from the same component line, as that used in the flow bias instrumentation design. The review showed all as-found data to be within limits without any need for recalibration.

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket No. 50-277
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License Nos. DPR-44
DPR-56

License Change Request
ECR 96-00627

"Surveillance Requirements for APRM Flow
Units and Associated Flow Transmitters"

Supporting information for changes - 3 pages

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SR 3.3.1.1.19

The Average Power Range Monitor Flow Biased High Scram Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that the flow unit instrumentation that supplies the recirculation flow signal to the APRM system responds to the measured recirculation flow within the necessary range and accuracy by use of a standard pressure source. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations.

The Frequency of 24 months is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components will pass the Surveillance when performed at the 24 month Frequency.