Enclosure

INITIAL EVENT INVESTIGATION REPORT
EIR-2014-011

C-Farm Vapor Related Incident on April 28, 2014

Consisting of 15 pages
Including cover sheet
EVENT INVESTIGATION REPORT

C-Farm Vapor Related Incident on April 28, 2014

Event Investigation Report Number EIR-2014-011

Event Investigation Team Lead

PER Responsible Manager

PER No. WRPS-PER-2014-0759 - This PER has been rolled up to WRPS-PER-2014-0602
C-Farm Vapor Related Incident on April 28, 2014

Investigation Summary

On April 28, 2014 after completing the exchange of the Continuous Air Monitor (CAM), Record Sampler Air Sample Filters at the POR107 Exhauster and operation’s routine retrieval rounds TO-220-124, “Over-Ground Transfer from 241-C-102 to 241-AN-101 and Sluicing of Tank 241-C-102,” and TO-060-108, “Operate POR107 Portable Exhaust Ventilation System” in 241-C-Farm, two workers experienced symptoms of exposure which is an entry condition for TF-AOP-015 “Response to Reported Odors or Unexpected Changes to Vapor Conditions”.

A fact finding meeting of the C-Farm AOP-015 entry was held at 0800 on Tuesday, April 29, 2014.

During the event, among a number of tasks being performed within the C-Farm entry was replacement of the POR-107 CAM and record sampler filter papers. Continuous IHT coverage was present and as the CAM cabinet was being opened monitoring data obtained using direct reading instruments indicated conditions inside the cabinet to be similar to the conditions outside the sample cabinet. These readings were substantially below action levels. When the CAM filter paper assembly was opened, elevated VOC’s were detected at the source at a level of 1.370 ppm which is below the action level of 2 ppm for a general work area. When the record sampler filter paper assembly was opened direct reading instruments at the source measured VOC’s at 2.213 ppm. The VOC’s at this source was above the action level for a general work area but as the team backed away from the open cabinet the levels in the general area remained below action limits. After the vapors in the cabinet cleared the sample papers were replaced and the team proceeded to the next work site at POR-003. During the fact finding meeting, the affected personnel communicated that they did not feel symptoms at the POR-107 Exhauster. Some of the crew indicated that they smelled strong odors after they went down the stairs on the berms towards POR-03 Exhauster. At this time and location two of the workers started to experience symptoms. None of the other three individuals in the work team (not wearing respirators) smelled odors at that location and the direct reading IH instruments also did not detect vapors there.

The initial response to the AOP-015 on April 28th activation was to perform IH sampling at the POR-107 CAM cabinet area. After the fact finding meeting, an additional entry into C-Farm was made on 4/29/14 to obtain samples from the area near POR-03 Exhauster as identified by the affected personnel.

Event Timeline

04/28/2014

0700 Started day shift – routine retrieval operations tasks planned

NOTE: POR107 was ventilating C-102 (@ 1200 cfm) at this time.

1207 C-102 Slurry and Supernate pumps were shut off to perform POR107 CAM and record sampler filter change out per TF-OPS-024, Inspections and Source Checks of AMS-4 CAMs and Effluent Record Samplers on HMI-Controlled Exhausters Type.

1225 Filter paper change outs complete.

1228 C-102 Slurry and Supernate pumps were restarted.
OE (#1) contacted OE (#2) that he had received a radio call and needed an OE to report to the construction/retrieval change trailer (MO-522).

OE (#2) arrives at MO-522 and is told by workers they had experienced vapors and symptoms.

OE (#2) notified OE (#1) of the situation.

OE (#1) notified Central Shift Manager (CSM) that workers had experienced vapors and symptoms and they discuss AOP-015 criteria.

Note: Timely information from the retrieval OEs was acknowledged by the CSM as a positive factor in this event.

C-102 Slurry and Supernate pumps were shutdown due to odors/vapors reported by the workers. (This was a conservative decision by OE (#1) as TF-AOP-015 entry criteria conditions had not been met)

TF-AOP-015 entered for employee showing symptoms of exposure. SOEN sent, radio announcement made.

IHT lead reported to the Retrieval OE (#1) that elevated readings at POR107 exhauster during paper change were 2213 ppb VOCs, 0 ammonia at the source and 600 ppb VOCs in breathing zone.

Admin lock condition installed for C-102 slurry pump and AN-101 supernate pump (OE Log)

CSM Log entry – Entry 1255 occurred at POR107 while performing OPS-033, readings in the cabinet VOC 2213 ppb, mercury 0 mg/m³, ammonia 0% ppm. Outside cabinet in breathing space below action levels VOC 600 ppb, mercury 0 mg/m³, ammonia 0 ppm. Per (Retrieval IH)

TF-AOP-015 response performed by IH direction at POR107. Inside sample (CAM) cabinet POR107-VTP-ENCL-550

Note: IH data results attached (Attachment 1)

CSM Log entry- Two employees that reported to HPMC released to work with restrictions awaiting medical lab results.
April 28, 2014

Two WRPS employees were sent to the site medical provider for evaluation Monday afternoon for potential exposure to chemical vapors in C Farm. Both employees were cleared to return to work late Monday.

Waste retrieval resumed Sunday in tank C-102. Seven workers were in the farm when the potential exposure occurred. Retrieval operations were stopped and the farm was immediately evacuated as a precaution.

C-Farm access remains restricted pending completion of an event investigation to be conducted Tuesday morning and implementation of any corrective actions, which will be communicated to employees.

President and Project Manager

Compensatory Measures

Initial compensatory measure was to restrict access into C-Farm in accordance with the TF-AOP-015 procedure. After IHT investigation (Attachment 1) was completed access was restored to C-Farm (5/2/2014), however waste disturbing C-102 retrieval was suspended until the actions listed below were accomplished (as well as other technical issues not related to this event).

The Industrial Safety department completed collection and processing of the C-102 Retrieval initial startup sampling protocol that could be evaluated locally (4/28/2014). The results indicated that no vapor levels had reached action limits in breathing air spaces. There had been positive indications of Ammonia, VOC’s, and Mercury. The highest readings from direct reading instruments in worker breathing areas are identified in the following table:

<table>
<thead>
<tr>
<th>Chemicals</th>
<th>Levels found in C and AN Farm</th>
<th>Action Limit</th>
<th>% of Action Limit</th>
<th>Occupational Exposure Limit</th>
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<tr>
<td>Ammonia</td>
<td>1 ppm</td>
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<td>VOCs</td>
<td>0.7 ppm</td>
<td>2 ppm</td>
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<td>Mercury</td>
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<td>0.176%</td>
<td>0.075 mg/m3</td>
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<td>Nitrous Oxide</td>
<td>0 ppm</td>
<td>12 ppm</td>
<td>0%</td>
<td>50 ppm</td>
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</table>

Source samples were also collected in C and AN Farms and will be analyzed by the lab. IHT’s had collected over 20 personal samples and over 30 area samples prior to the event. AreaRAE monitoring was also being conducted in C-Farm, AN-Farm, and the MO-117 Control Trailer. The AreaRAE’s are remotely monitored from MO-598 and each unit alarms at the appropriate action limits.
Preliminary Extent of Condition Review

A number of recent vapor related events have occurred in various locations throughout Tank Farms. See WRPS-PER-2014-0602

Discussion of Potential Causes

The location where this event occurred and the weather conditions at the time are a strong indicator that the cause was from vapors exiting the POR-107 exhauster resulting from the retrieval sluicing operation in C-102 SST.

Discussion of Barriers That Could Have Impacted the Cause

1. Engineering Design. The POR-107 exhauster with its stack height and flow rate should have allowed adequate dilution of the vapors coming from C-102 retrieval.

2. Communications. The initial information was that the area of concern was at the POR-107 CAM cabinet. However during the fact finding the information from the two workers who reported symptoms stated the odors were strongest on the way to POR-003 in the trench area and as they crossed the walkway over the ventilation ducting going towards POR-003. This required a follow up sampling and survey at the POR-003 area the next day.

3. Management Oversight. This was a positive aspect from this event in that a Senior Supervisory Watch manager accompanied the team that experienced the odors however as was the case with other workers in the team he did not experience any odors/symptoms.

4. Procedures. Unlike the CAM filter change out procedures used in the DST ventilation systems the ones for SST retrieval (TF-OPS-024 & TF-OPS-018) do not require respiratory protection. This might have been a contributing factor for the workers who experienced symptoms.

Recommendations/Proposed Corrective Actions

Prior to C-102 retrieval resumption the SST R&C organization:

- Issue the AOP-015 Vapor Exposure Communication Report (A-6005-744) from this event near POR-107 & POR-03 Exhausters-Completed 5/1/2014
- Establish requirement to maintain POR-107 stack flow at or above 1000 cfm for C-102 Retrieval—Completed See SST R&C Shift Instructions 5/8/2014
- Establish IHT surveillance program to periodically monitor specific source locations and general area within C-Farm and AN Farm—Completed with the issuance of IHSP-COPC-RTNE-01 on 5/6/2014
- Evaluate and establish additional IH sampling for areas outside of C-Farm, AN-Farm and transfer corridor—Completed with the issuance of IHSP-COPC-RC-12 on 5/7/2014
- Provide additional information to be placed on Daily Report to communicate that odors are expected in C-Farm, AN-Farm and transfer corridor as a result of C-102 Retrieval. This information is intended to be communicated to field work teams in
C Farm Vapor Related Incident on April 28, 2014

advance of field work via morning meetings and pre-jobs—Completed with issuance of Standing Order OPS-13-011 Rev 5 on 5/8/2014

- Establish use of half masks with GME cartridges (MSA Advantage 200LS) during retrieval activities until stack off gas sample represent normal C-Farm background—Completed with issuance of Standing Order OPS-13-011 Rev 5 on 5/8/2014
- Establish and communicate Vapor Reduction Zones in areas outside of C-Farm where odors may be present—Completed with issuance of Hot Topic “C-Farm VCZ” issued on May 8, 2014

Post C-102 Resumption the following actions are recommended:

- Evaluate C-Farm CAM Sample Paper change out activity prior to next performance to evaluate respiratory requirements.
- Complete rush on source sampling 59 COPC’s that were obtained during the initial startup of C-102. (Provides validation that COPC’s analyzed @ stack by outside lab is consistent with HAPSITE results)
- Evaluate use of 1 hour bottles for voluntary SCBA upgrade (current ½ hour bottles)
- Establish Event Questionnaire to provide rapid and accurate event information to aid in proper evaluation of field conditions on a real time basis.
- Provide additional wind socks in and around C-Farm and AN-Farm to provide better indication of wind direction at specific work locations.
- Evaluate and establish if appropriate IHT real time bag sampling capability.
- Update AOP-015 to incorporate recent lessons learned.
- Recommend that the CVST benchmark other industries to review methods to accommodate worker sensitivities to odors/vapors.
- Establish criteria to apply respiratory protection for work activities in all farms where low threshold vapors or odors are anticipated or there is potential for new emission sources. Promulgate new requirements on new standing order.

Attachments:

1. AOP-015 Vapor Exposure Communication Form
2. Photo of C Farm event area
3. Attendance rosters for the Fact Finding meeting of 4/29/2014
1.0 Summary:

Abnormal Operating Procedure-015, Response to Reported Odors or Unexpected Changes to Vapor Conditions, was entered in response to field reports from the Retrieval/Closure field crew performing CAM Cabinet filter paper change outs to the Central Shift Office. Area of reported odor was at the POR107 CAM Cabinet. Industrial Hygiene Technician (IHT) support was deployed to the scene with direct read instrumentation and bag sampling capabilities. Additionally, a Nuclear Control Operator (NCO) and a Health Physics Technician (HPT) was deployed to support entry into the Cam Cabinet. Sample plan IHP-09001HR was utilized to obtain monitoring and sampling evolutions. Below in sections 2.0 and 3.0 is the data obtained from this event as well as a detailed time line of events. A problem evaluation request (PER) was generated as a result of this AOP-015 event and documented on WRPS-PER-2014-0759.

In addition, retrieval of C-102 started on 4/25/2014 with the addition of approximately 50,000 gallons of water which started at approximately 11 a.m. and commenced at approximately 1:00 p.m. The start of C-102 was retrieval started on 4/27/2014 at approximately 2 p.m. A summary of data collected during these evolutions of retrieval are stated below in section 3.0 below.

On 4/29/14 an event investigation was held where it was stated that additional odors were experienced at the bottom of the berm below the POR107 exhauster between the stairway and the stairway leading to the demister by C-107 as well as the area around the west side of the POR03 exhauster.

2.0 Data Results (AOP-015 Event 4/29/2014)

1. At the time of reported event (DRI #14-02023):
   • 12:15 p.m. (CAM Side)
     o Ammonia = 0 ppm
     o Mercury = 0 ng/m³
     o VOCs = 1,370 ppb or 1.370 ppm
   • 12:20 p.m. (Record Sampler Side)
     o Ammonia = 0 ppm
     o Mercury = 30 ng/m³
     o VOCs = 2,213 ppb or 2.213 ppm

2. AOP-015 Response (4/28/14):
   • Inside Sample (CAM) cabinet POR107-VTP-ENCL-550
     o Ammonia = 0 ppm
     o Mercury = 3 ng/m³
     o Nitrous Oxide = 0.8 ppm
     o VOCs = 15 ppb
     o Hapsite = concentrations totaling 44.2 ppb with the largest peaks being:
       * Limonene = 11.7 ppb
C Farm Vapor Related Incident on April 28, 2014

Attachment 1

- 2-Ethyl-1-Hexanol = 6.0 ppb
- Dodecane = 4.7 ppb
- Nonanal = 1.4 ppb

- Outside Sample (CAM) cabinet POR107-VTP-ENCL-550
  - Ammonia = 0 ppm
  - Mercury = 2 ng/m³
  - Nitrous Oxide = 0.8 ppm
  - VOCs = 0 ppb
  - Hapsite = concentrations totaling 160.9 ppb with the largest peaks being:
    - Undecane = 84.4 ppb
    - Dodecane = 14.1 ppb
    - Decane = 15.8 ppb
    - Limonene = 13.6 ppb

3. AOP-015 Follow-Up Response (6/29/14)
- Area between southside of POR107 duct line at bottom berm stairway to bottom of stairway near demister by C-107
  - Ammonia = 0 ppm
  - Mercury = 25 ng/m³
  - Nitrous Oxide = 0 ppm
  - VOCs = 0 ppb
  - Hapsite = concentrations totaling approximately 71.2 ppb with the largest peaks being:
    - 2,4-Dimethylheptane = 25.2 ppb
    - 4-Methyl-octane = 8.9 ppb
    - 2-Ethyl-1-hexanol = 6.7 ppb
    - 2-Methyl-5-cyclohexanol = 3.9 ppb
    - Dodecane = 26.5 ppb

- Area around west side of the POR03 exhauster
  - Ammonia = 0 ppm
  - Mercury = 9 ng/m³
  - Nitrous Oxide = 0 ppm
  - VOCs = 0 ppb
  - Hapsite = concentrations totaling approximately 28.5 ppb with the largest peaks being:
    - Hexane = 2.5 ppb
    - 2,4-Dimethylheptane = 7.2 ppb
    - 4-Methyloctane = 2.8 ppb
    - 2-Ethyl-1-hexanol = 2.8 ppb
    - 2-Methyl-5-cyclohexanol = 2.4 ppb
    - Dodecane = 8.2 ppb
    - Nonanal = 2.6 ppb

3.0 Time Line of Events [AOP-015 Event 4/28/2014]

- 12:57 p.m.: Call from Retrieval/Closure (R/C) IHT lead, whom provided the following information:
  - At 12:20 p.m., a crew of seven personnel (2 IHTs, 2 HPTs, 2 NCOs, and 1 Manager) were supporting Ops 33 at the POR107 Cam Cabinet. IHT performed direct read instrumentation monitoring at the
time of the filter paper change out for VOCs (= 2.213 ppb or 2.213 ppm), Ammonia (=0 ppm), and Mercury (= 0 mg/m³); the VOC reading did not sustain. Concurrent breathing zone readings were obtained through direct read instrumentation monitoring for VOCs (=600 ppb or 0.600 ppm), Ammonia (=0 ppm), and Mercury (= 0 mg/m³). Personnel exited the farm through the "retrieval change trailer" located on the east side of C-Farm.

~ 12:58 p.m.: SOEN (shift office event notification) received "Entering AOP-015 for C Farm. All personnel evacuate C Farm. CSM"
~ 12:58 p.m.: Call to Shift Office Manager (SOM), to obtain information stated above under time stamp 12:57 p.m. SOM asked for respiratory protection worn (if any) of the 7 personnel involved with the event. Additionally, SOM stated both HPT personnel were sent to HMPC. I stated the need for an NCO and HPT to respond to this event in a self-contained breathing apparatus (SCBA).

~ 1:15 p.m.: Call to Operations Engineer (OE), to obtain respiratory protection worn by what personnel. He stated the 2 NCOs were an SCBA (voluntary respiratory upgrade). Of the 7 personnel no others wore respiratory protection.
~ 1:17 p.m.: Call to to obtain personal sampling information; 1 full C-Farm sampling was work each an HFT, HPT, and NCO. I provided direction to have these samples sent to the ASAP with a "rush" turnaround.
~ 1:18 p.m.: Call from Base Ops Industrial Safety/HFT Supervisor, and provided information stated above in time stamp 12:57 p.m. He stated Base Ops Shift HFT responder, would be responding.
~ 1:21 p.m.: Call to SOM to provide information on voluntary respiratory protection worn by the 2 NCOs (SCBA).
~ 1:22 p.m.: Retrieval/Closure HFT Supervisor, provided symptoms reported by HFT Supervisor, HFT 1 – labored breathing and burning sensation in lungs HFT 2 – dry throat and headache
~ 1:28 p.m.: SOEN sent "C-102 retrieval secured. Admin conditions re-applied. AN ADM"

~ 1:29 p.m.: R/C HFT Supervisor provided HFT AOP-015 response, Direction provided by self:
  2 bag samples to be obtained inside the CAM Cabinet
  2 bag samples to be obtained outside the CAM Cabinet
  Direct read instrumentation monitoring with an ITX (Ammonia), Lumex (Mercury), and ppbRAE (VOCs)
Upon receipt of bag sampling in the lab HFTs were to obtain Ammonia, Mercury, Nitrous Oxide, and VOC readings from each set of bag samples taken.
~ 1:35 p.m.: Call to SOM to relay HFT support
~ 1:38 p.m.: Call to SOM to relay required respiratory protection during event response to be SCBA
~ 1:54 p.m.: Information from retrieval Waste Transfer Pump stopped at approximately 12:07 a.m. Call to procedure OPS 18 was being utilized for this work.
~ 6:00 p.m.: Call to information from states procedure OPS 24 to be the correct document for the CAM Cabinet and Record Sampler filter paper change outs.
~ 3:20 p.m.: Call from HFT, to notify exit of farm and return the 2704 HIV lab.
4.0 Time of Events [AOP-015 Continued Response 4/29/2014]

~ 2:50 p.m.: Call to SOM, to provide additional information on continued AOP-015 response
~ 3:08 p.m.: Call from SOM providing information on radiological work permit to be used.

5.0 Summary of C-102 Retrieval/Water Addition Data Collection

On 4/24/2014, an ES&Q Communications went out providing information on industrial hygiene sampling and monitoring activities to be performed during the water addition and initial start-up of the C-102 waste retrieval. Access to C- and AN-Farms was restricted during these activities. Additionally, continuous IHT coverage was required as well as increased personal sampling and monitoring and bag sampling in addition to those requirements stipulated in sample plans IHSP-COPC-RC-01R2, Bulk/Hard Heel Removal (HHR) Retrieval: Personal Sampling/Monitoring for retrieval activities of tank waste contents, and IHSP-COPC-RC-02R1, Bulk/Hard Heel Removal (HHR) Retrieval: Source/Work Area Sampling & Monitoring for retrieval activities of tank waste contents, and IHSP-COPC-RC-05R1, C-102 Environmental Toxic Air Pollutants (TAPs) Sampling — retrieval activities of tank waste contents.

1. Sampling — Personal & Area
   • Water Addition
     • Personal - 2 (1 NCD and 1 IHT)
     • Area - 1 (at POR107 exhauster compass points)
   • Waste Retrieval
     • Personal: 23 (8 IHTs, 9 NCDs, 6 HPTs)
     • Area: 37 (at POR107 exhauster and AN-Primary Exhauster compass points)

2. Source sampling
   • 59 Chemicals of Potential Concern (COPCs)
     • POR107 prior to start-up
     • POR107 Exhauster
     • AN-Primary Exhauster.

3. Toxic Air Pollutant (TAPs) Source Sampling
   • POR107 exhauster

4. Bag Sampling
   • 3 Bag Samples Obtained:
     • POR107 Exhauster
       o Ammonia = 1 ppm
       o Mercury = 7 ng/m³
       o Nitrous Oxide = 0 ppm
       o VOC = 430 ppb
       o Hapsite = concentrations totaling 26.5 ppb with the peaks being:
         v Undecane = 16.1 ppb
         v Decane = 2.9 ppb
     • C102 Pump Pit
       o Ammonia = 0 ppm
       o Mercury = 3 ng/m³
       o Nitrous Oxide = 0 ppm
       o VOC = 300 ppb
5. Personal Direct Read Monitoring
   • Water Addition
     * 3 surveys
       o Peak Ammonia Reading = 0 ppm
       o Peak VOC Reading = 0 ppb
       o Peak Mercury Reading = 8.00 ng/m³
   • Waste Retrieval
     * 8 surveys
       o Peak Ammonia Reading = 19 ppb
       o Peak VOC Reading = 300 ppb
       o Peak Mercury Reading = 22 ng/m³

6. Area Direct Read Monitoring
   • Water addition
     * 3 Surveys
       o Peak Ammonia Reading = 800 ppb
       o Peak VOC Reading = 700 ppb
   • Waste Retrieval
     * 8 Surveys
       o Peak Ammonia Reading = 300 ppb
       o Peak VOC Reading = 100 ppb
Attachment 2

Exit through Construction Change trailer MO-522

POR107 - CAM and record sampler filter change out - when cabinet opened odors reported. IH testing detected mercury.

Route taken by workers - POR107 on cat tracks into gulley towards POR03.

Towards POR03 odors reported. Odors reported in the gulley area.
<table>
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<tr>
<th>Print Name</th>
<th>Signature</th>
<th>Payroll Number/SSN</th>
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Date: 4/29/14

Critique Title: TE-KOR-15 @ POR-107

Critique Number: EIR-2014-011
## Event Investigation/Critique Attendance Form

**Date:** 4/29/2014  
**Critique Title:** EIR-2014-01  
**Critique Number:**

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A-6003-100 (05/01)