

October 1, 2010

Julia A. Schmitt, Manager  
Office of Radiological Health  
Department of Health and Human Services  
301 Centennial Mall South  
P.O. Box 95026  
Lincoln, NE 68509-5026

Dear Ms. Schmitt:

We have reviewed the proposed changes to the Nebraska regulations, 180 NAC 1, 3, 4, 7, 10, and 13, received by our office on August 16, 2010. These regulations were reviewed by comparison to the equivalent Nuclear Regulatory Commission (NRC) rules in 10 CFR Parts 19, 20, 30, 31, 32, 33, 35, 40, 61, 70, 71, and 150 and the requirements of the seven amendments identified in the enclosed State Regulation Status (SRS) Data Sheet. We discussed our review of the regulations with you on September 29, 2010.

As a result of our review, we have 22 comments that have been identified in the enclosure. Please note that we have limited our review to regulations required for compatibility and/or health and safety. Under our current procedure, a finding that the Nebraska regulations meet the compatibility and health and safety categories of the equivalent NRC regulation may only be made based on a review of the final Nebraska regulations. However, we have determined that if your proposed regulations were adopted, incorporating our comments and without other significant change, they would meet the compatibility and health and safety categories established in the Office of Federal and State Materials and Environmental Management Programs (FSME) Procedure [SA-200](#).

We request that when the proposed regulations are adopted and published as final regulations, a copy of the "as published" regulations be provided to us for review. As requested in FSME Procedure [SA-201](#), "Review of State Regulatory Requirements," please highlight the final changes, and provide a copy to Division of Materials Safety and State Agreements, FSME.

The SRS Data Sheet summarizes our knowledge of the status of other Nebraska regulations, as indicated. Please let us know if you note any inaccuracies, or have any comments on the information contained in the SRS Data Sheet. This letter, including the SRS Data Sheet, is posted on the FSME website: <http://nrc-stp.ornl.gov/rulemaking.html>.

If you have any questions regarding the comments, the compatibility and health and safety categories, or any of the NRC regulations used in the review, please contact Kathleen Schneider, State Regulation Review Coordinator at (301) 415-2320 ([kathleen.schneider@nrc.gov](mailto:kathleen.schneider@nrc.gov)) or Monica Orendi at (301) 415-3938 ([monica.orendi@nrc.gov](mailto:monica.orendi@nrc.gov)).

Sincerely,

*/RA/*

Terrence Reis, Deputy Director  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and  
Environmental Management Programs

Enclosures:  
As stated

**[Concurrence Page]**

Enclosures: As stated

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COMPATIBILITY COMMENTS ON *NEBRASKA* PROPOSED REGULATIONS

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
1	3-18.08 & .09	40.36	2003-1	H&S	<p><b>Financial assurance and recordkeeping for decommissioning</b></p> <p>Nebraska needs to change 3-018.08 to read "...greater than <b>100mCi ...</b>" and 3-018.09 to read "...greater than 10mCi but less than or equal to <b>100mCi...</b>".</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category H&amp;S designation assigned to 10 CFR 40.36.</p>
2	13-005	71.5	2004-1	B	<p><b>Transportation of licensed material.</b></p> <p>Nebraska lists the wrong 49 CFR references. Nebraska needs to remove "49 CFR parts 107, <b>171 through 189</b>, and 390 through 397" and replace it with "49 CFR parts 107, <b>171 through 180</b>, and 390 through 397".</p> <p>Nebraska's regulation 13-005.02 is not essentially identical to 10 CFR 71.5(b). Nebraska needs to remove "49 CFR Parts 170 through 189" and replace it with "49 CFR Parts 107, 171 through 180, and 390 through 397". Also Nebraska needs to add "A request for modification, waiver, or exemption from those requirements, and any notification referred to in those requirements must be filed with, or made to, the Department." to the end of 13-005.02.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					Nebraska needs to make the above changes in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.5.
3	13-015.09-.11	71.47	2004-1	[B]	<p><b>External radiation standards for all packages</b></p> <p>Nebraska omits regulations essentially identical to 10 CFR 71.47 (c) &amp; (d).</p> <p>Nebraska needs to add regulations essentially identical to 10 CFR 71.47 (c) &amp; (d) to 13-015 in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.47.</p>
4	13-016	71.88	2004-1	[B]	<p><b>Air transport of plutonium.</b></p> <p>Nebraska lists an incorrect reference in 13-016.03. Nebraska needs to remove "180 NAC 13-015.04" and replace it with "180 NAC 13-016.01 item 4."</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.88.</p>
5	13-021	71.105 (a), (c), & (d)	2004-1	C	<p><b>Quality assurance program.</b></p> <p>Nebraska omits regulations essentially identical to 10 CFR 71.105 (c) &amp; (d).</p> <p>Nebraska needs to add regulations to 13-021 which are essentially identical to 10 CFR 71.105 (c) &amp; (d) in order to meet the Compatibility Category C designation assigned to 10 CFR 71.105 (a), (c), &amp; (d).</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
6	7-043	35.190	2007-1 2009-1	H&S	<p><b>Training for uptake, dilution, and excretion studies</b></p> <p>Nebraska omits “the Department” after “U.S. Nuclear Regulatory Commission” in the first sentence of 7-043.01.</p> <p>Nebraska needs to insert an “and” between “1” and “2” and remove “and 3” from 7-043.01 item 1.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 35.190.</p>
7	7-047	35.290	2007-1 2009-1	H&S	<p><b>Training for imaging and localization studies</b></p> <p>Nebraska needs to add “the Department” between “recognized by” and “an Agreement State” in 7-047.01.</p> <p>Nebraska needs to remove the first “7-051” from 7-047.03 item 1.b.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 35.290.</p>
8	3-004.01	30.14	2007-2	B	<p><b>Exempt Concentrations</b></p> <p>Nebraska lists the wrong reference in 3-004.01 item 1. The first sentence currently reads “Except as provided in 3-004.01 item 2 and 3 ...”. This sentence should read “Except as provided in 3-004.01 items <b>3 and 4</b>...”.</p> <p>Nebraska needs to rewrite 3-004.01 item 1 to read as follows “Except as provided in 3-004.01 items 3 and 4, any person is exempt from the requirements for a license in 180 NAC</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					<p>3, 5, 7, 14, and 19 to the extent that such person receives, possesses, uses, transfers, owns, or acquires ....”</p> <p>Nebraska lists a wrong reference in 3-004.01 item 3. The sentence currently reads “...not in excess of those specified in 180 NAC 3, Appendix 3-1 and introduced ...”. The sentence should read “... not in excess of those specified in 180 NAC 3 Appendix <b>3-A</b> and introduced ...”.</p> <p>Nebraska needs to make the above changes to 3-004.01 in order to meet the Compatibility Category B designation assigned to 10 CFR 30.14.</p>
9	3-004.03	30.15	2007-2 2007-3	B	<p><b>Certain items containing byproduct material</b></p> <p>Nebraska needs to add “the requirements for a license set forth in” between “...any person is exempt from” and “Title 180 to the extent...” in 3-004.03 item 1.a.</p> <p>Nebraska omits an essentially identical regulation to 10 CFR 30.15(a)(7) from 3-004.03 item 1.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 30.15.</p>
10	3-004.02	30.18	2007-2 2007-3	B	<p><b>Exempt quantities</b></p> <p>Nebraska needs to add “the requirements for a license set forth in” between “...any person is exempt from” and “Title 180 to the extent...” in 3-004.02 item 1.</p> <p>Nebraska needs to add “or similar general license of the U.S. Nuclear Regulatory Commission or another</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					<p>Agreement State” after “180 NAC 3-008” in 3-004.02 item 2.</p> <p>Nebraska needs to remove “180 NAC 3” and replace it with “Title 180” in 3-004.02 item 2.</p> <p>Nebraska needs to remove “or by the Department pursuant to 180 NAC 3-014.02” after “10 CFR 32.18” in 3-004.02 item 4 since Nebraska does not have authority for this. 10 CFR 32.18 is a Compatibility Category NRC.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 30.18.</p>
11	1-002	20.1003 30.4 150.3	2007-3	H&S	<p><b>Definition: Byproduct Material</b></p> <p>Nebraska omits sections (3) and (4) from their definition of Byproduct material.</p> <p>Nebraska needs to add equivalent sections to sections (3) and (4) of NRC’s definition of byproduct material in order to meet the Compatibility Category [H&amp;S] definition assigned to 10 CFR 20.1003 definition: byproduct material.</p>
12	3-004.03 item 3	30.20	2007-3	B	<p><b>Gas and aerosol detectors containing byproduct material</b></p> <p>Nebraska needs to add “the requirements for a license set forth in” between “...any person is exempt from” and “Title 180 to the extent...” in 3-004.03 item 3.a.</p> <p>Nebraska needs to remove “or an Agreement State, pursuant to 180 NAC 3-014.03,” from 3-004.03 item 3.a. since 10 CFR 32.26 is a Compatibility Category NRC.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					<p>Nebraska needs to remove “product for use under 10 CFR 32.26” from 3-004.03 item 3.a. and replace it with “product for use under 180 NAC 3-004.03”</p> <p>Nebraska needs to remove “This exemption also covers gas and aerosol detectors manufactured or distributed before November 30, 2007 in accordance with a specific license issued by the U.S. Nuclear Regulatory Commission or by a State under comparable provision to 10 CFR 32.26 authorizing distribution detectors to persons who are exempt from regulatory requirements.” and replace it with “This exemption also covers gas and aerosol detectors manufactured or distributed before November 30, 2007 in accordance with a specific license issued by a State under comparable provision to 10 CFR 32.26 authorizing distribution detectors to persons who are exempt from regulatory requirements.”</p> <p>Nebraska needs to add “the US Nuclear Regulatory Commission or” between “equivalent regulations of” and “an Agreement State” in 3-004.03 item 3.b.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 30.20.</p>
13	3- Appendix 3-B	30.71	2007-3	B	<p><b>Schedule B</b></p> <p>Nebraska omits “Germanium 68 (Ge 68) ...10) from its table in Appendix 3-B.</p> <p>Nebraska needs to add the above to its Appendix 3-B in order to meet the Compatibility Category B designation assigned to 10 CFR 30.71.</p>



STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
14	3-008.11	31.12	2007-3	C	<p><b>General license for certain items and self-luminous products containing radium-226</b></p> <p>Nebraska needs to add “manufactured prior to November 30, 2007” after “...in the following products” in 3-008.11.01A.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category C designation assigned to 10 CFR 31.12.</p>
15	7-022	35.50	2009-1	B	<p><b>Training for Radiation Safety Officer</b></p> <p>Nebraska states in 7-022.01 item 2.b.(1) “...by a specialty board recognized by an agreement state of the U.S. Nuclear Regulatory Commission.” This is incorrect and should read “...by a specialty board recognized by an agreement state <b>or</b> the U.S. Nuclear Regulatory Commission.”</p> <p>Nebraska needs to add an “or” at the end of 7-022.01 item 2.b.(1).</p> <p>Nebraska needs to remove the “and” after 7-022.01 item 2.b.(2).</p> <p>Nebraska needs to remove the “and” at the end of 7-022.02 item 1.b.(7) and replace it with an “or”. Also Nebraska needs to remove 7-022.02 item 2. from its regulation.</p> <p>Nebraska needs to remove “who meets the requirements in 180 NAC 7-022.04 and 7-022.05.” from 7-022.03 item 2.</p> <p>Nebraska needs to add an “and” to the end of 7-022.04.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					<p>Nebraska needs to add “the Department” to 7-022.01, 7-022.01 item 2.b.(1), 7-022.02 item 1.b., and 7-022.03 item 1. to the list of those who recognize.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CGR 35.50.</p>
16	7-023	35.51	2009-1	B	<p><b>Training for an authorized medical physicist.</b></p> <p>Nebraska omits “Except as required in 180 NAC 7-026” from the beginning paragraph of 7-023.</p> <p>Nebraska needs to remove 7-023.02 2.</p> <p>Nebraska needs to add the word “and” to the end of 7-023.03.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 35.51.</p>
17	7-026	35.57	2009-1	B	<p><b>Training for experienced Radiation Safety Officer, teletherapy or medical physicist, authorized medical physicist, authorized user, nuclear pharmacist, and authorized nuclear pharmacist.</b></p> <p>Nebraska needs to add “or a Department” between “an Agreement State” and “license” and between “an Agreement State” and “broad scope licensee” in 7-026.01 and 7-026.02.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category B designation assigned to 10 CFR 35.57.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
18	7-051	35.390	2009-1	B	<p><b>Training for use of unsealed byproduct material for which a written directive is required.</b></p> <p>Nebraska needs to add “the Department” between “recognized by” and “an Agreement State” in 7-051.01.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category B designation assigned to 10 CFR 35.390.</p>
19	7-052	35.392	2009-1	B	<p><b>Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries).</b></p> <p>Nebraska needs to add “the Department” between “recognized by” and “an Agreement State” in 7-052.01.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category B designation assigned to 10 CFR 35.392.</p>
20	7-053	35.394	2009-1	B	<p><b>Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries).</b></p> <p>Nebraska needs to add “the Department” between “recognized by” and “an Agreement State” in 7-053.01.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category B designation assigned to 10 CFR 35.394.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
21	7-054	35.396	2009-1	B	<p><b>Training for the parenteral administration of unsealed byproduct material requiring a written directive.</b></p> <p>Nebraska needs to add “or NRC” between “equivalent Agreement State” and “requirements” in 7-054.01 and 7-054.02.</p> <p>Nebraska needs to add “the Department” between “recognized by” and “the U.S. Nuclear Regulatory Commission” in 7-054.03.</p> <p>Nebraska needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 396.</p>
22	7-84	35.690	2009-1	B	<p><b>Training for use of remote afterloader units, teletherapy units, and gamma stereotactic radiosurgery units.</b></p> <p>Nebraska needs to add “the Department” between “recognized by” and “an Agreement State” in 7-084.01.</p> <p>Nebraska needs to remove “High and low dose rate brachytherapy” from 7-084.01 item 2. and replace it with “remote afterloaders”.</p> <p>Nebraska needs to make the above change in order to meet the Compatibility Category B designation assigned to 10 CFR 35.690.</p>

**STATE REGULATION STATUS**

State: Nebraska

Tracking Ticket Number: 10-38

[7 amendment(s) reviewed is identified by a ★

Date: October 1, 2010

at the beginning of the equivalent NRC requirement.]

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
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RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
FJJİ Ē Ā	ŠȦ\)*•Ā!ĪŦā~•dāđĀ Ūāāđ *!āđ @Ā} āŪāāāā} Ā Ūāāc ĀŪ^~ ā^(\)•Ā!Ī Ā Ŧā~•dāđŪāāđ *!āđ @Ā U] ^!āā} •Ā Ūāā ĀĒĀ ĒĀ ĒĀĒ ĒĀ ĪĦŪĀĒ ĪĪĀ	Ē Ē ĒĒĒĒĒ	ŦāđĀ T ŠĒĒĪĪĦĪĪ Ā	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒĒĒ Ā	
FJJİ Ē Ā	Ūāāđ [   * ŠȦ\)*Ā! ŠȦ\)*Ā! Ūāā ĀĒĀ ĒĀ ĒĀ ĪĦŪĀĒ ĒĪĀ	Ē ĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĒĒĒĒĒ ĪĪ Ā	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒ ĪĪ Ā	
FJJİ Ē Ā	ÖĀ{ } ōŪāđāđ đĀ Ī ĀĀ Ūāāđ āāāĀĪ *ĪŦ[ } āā đ * Ā U] ^Ī ā [ & Īā ĪĪŦāā{ } Ē ĦĪĀĪĀĀ ŪāāĒĀ ĪĦŪĀĒ ĦĪĪ Ā	ĒĒĒĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĪĪĦĪĪ Ā	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒĒĒ Ā	
FJJİ Ē Ā	ÖĪā^!āēĪĪāđ Ā & Ī} ā ŠȦ\)*Ā! ŦāđĀ *ĀĪĪ} •Ā Ūāā ĀĒĀ ĒĀ ĒĀ ĒĀ ĒĀ ĒĀ ĒĀ	ĒĒĒĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĒĒĒĒĒ ĒĪ ĪĪ Ā	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒĒĒ ĪĪ Ā	
FJJİ Ē Ā	ŪĪĪĒ Āāđ ĀĪĪĪĪĪ ÖĪā { { ā ā } ā *ĪŦ[ } āā * Ā āĪĪ } [   -āā } āĪĪ } ĪĪ } āĒ ŦāđĀ *ĀĪĪ} •Ā Ūāā ĀĒĀ ĒĀ ĒĀ ĪĦŪĀĒ ĪĪĪ ĪĪ Ā	ĒĒĒĒĒĒĒĒĒĒ	p[ ōŪĀ^~ āāĀĀ	p[ ōŪĀ^~ āāĀĀ	V@•ĀĀ^~  āā} & @ *ĀĪĪĪĪ [ ōĀ^~ āāāĪĪ Ā āĪĪ [ ĀāĪĪĪ ĪĪ [ ĀĪĪĪĪ [ ] āāāā ĒĀ
FJJİ Ē Ā		ĒĒĒĒĒĒĒĒĒĒ	p[ ōŪĀ^~ āāĀĀ	p[ ōŪĀ^~ āāĀĀ	V@•ĀĀ^~  āā} & @ *ĀĪĪĪĪ [ ōĀ^~ āāāĪĪ Ā āĪĪ [ ĀāĪĪĪ ĪĪ [ ĀĪĪĪĪ [ ] āāāā ĒĀ ŦĪĪĪŪŪĪĪĪĪ ĪĪ ĪĪ
FJJİ Ē Ā	ŠȦ\)*•Ā!ĪŦā~•dāđĀ Ūāāđ *!āđ @Ā} āŪāāāā} Ā Ūāāc ĀŪ^~ ā^(\)•Ā!Ī Ā Ŧā~•dāđŪāāđ *!āđ @Ā U] ^!āā} •Ā ŪāāĪ Ā ĪĦŪĀĒ ĒĪĪ ĪĪ ĪĪ ĪĪ ĪĪ	ĒĒĒĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĪĪĦĪĪ Ā	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒĒĒ Ā	
FJJİ Ē Ā	T ā [ ĪŦ[     & đĀ } •ĪŦ[ } āā đ * Ā ŦāđĀ *ĀĪĪ } āāĪĪ [ ĪĪ [ ĪĪ [ ĪĪ Ā ŦāđĀ *ĀĪĪ Ūāā ĀĒĀ ĒĪĪ ĪĪ ĪĦŪĀĒ ĪĪĪ ĪĪ ĪĪ ĪĪ ĪĪ ĪĪ	ĒĒĒĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĒĒĒĒĒ ĒĪ ĪĪ ĪĪ ĪĪ ĪĪ ĪĪ ĪĪ	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒ ĒĪ ĪĪ ĪĪ ĪĪ	
FJJİ Ē Ā	VĪā *ĀĪĪĪĪ [   •āā } āĀ T āđ ā •ĪĪ T ā [ ĪĪĪ & @ āāđ ŦāđĀ *ĀĪĪ } [   ĪĪ *ĪĪ } ā^(\)Ī ŪāāĒĀ ĪĦŪĀĒ ĒĒĪ ĪĪ ĪĪ	ĒĒĒĒĒĒĒĒĒĒ	ŦāđĀ T ŠĒĒĒ ĒĪĪ ĪĪ ĪĪ	p[ ĪŦ[ { { ^} •Ā ĒĒĒĒĒĒĒ T ŠĒĒĒĒĒĒĒ ĪĪ ĪĪ ĪĪ	



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FJJJEÁ	Üäää    * ääÖ: ä: äÄ: Ä Šä^)^.Ä^/(\ ä ää } Ä -Ä Wä ä { Ä^&  ç^!^ Ä ä ä ä .Ä ÜääÄ Ä Ï ÄÜÄÏ Ä	€ FFEDEEGÄ	P[ öÄ ]   ää^/Ä	P[ öÄ ]   ää^/Ä	P^ä: ä \ ää   ^ .Ä   ö ä ä Ä @ ä ä c ä   ä Ä Ä !^*   ä ä Ä @ Ä ä ä   ä ä } ä^/ ä Ä E   ^ ^ ( ^ ) ä Ä
FJJJEÄ	Ü^~ ä^ \ ^ ) • Ä:   Ä @ • Ä Y @ Ä   • • • • • Ä   ä ä Ä Qä • d ä ä / Ö ^ ç ä ^ • Ä Ö [ ] ä ä ä * Ä Ö ]   ä ~ & c Ä T ä ä   ä ä Ä   Ä   ç ä ^ Ä Ü^~ ^ • c ä Ä   {   ä ä } Ä ÜääÄ FÄ Ï ÄÜÄ GÄ JÄ	FEE DEEGÄ	P[ öÜ^~ ä^ äÄ	P[ öÜ^~ ä^ äÄ	V @ • Ä Ä * ~   ä ä } / & @ * ^ • ä ä Ä   ö Ä ~ ä^ ä Ä Ä ä^ ä ä [ ] c ä Ä   Ä ~ !   [ • • Ä - Ä Ö [ { } ä ä ä ä Ä
FJJJEÄ	Ü • ) ä ä   ^ Ä   ( c & ç ) ä ä ä Ä Ö [ ] d [   • Ä   Ä ^ • d ä ä c   ) ä ä Ä Ö [ ] ^ • ! ^ Ä ÜääÄ GÄ Ï ÄÜÄ Ä I I HÄ I ÄÜÄ Ä I I G Ä	€ EEEDEEÄ	Ö ä ä Ä T ŠE-FI EE I FÄ	P[ ÄÖ [ { { ^ } • Ä € EEEDEEÄ T ŠE-FI FEE Ä	
EEEEÄ	Ö   ^ ! * ^ Ä Ö [ { } ^ ) • ä ä } Ä Ü [ ^ ! & • Ä   Ä   Ä           * * ä * Ä ä ä ä Ä c @   Ä ^ ~   ä ä   ^ Ä Ö   ä ä ä ä ä } • Ä ÜääÄ UÄ Ï ÄÜÄ GÄ HÄ	€ EEEDEEÄ	Ö ä ä Ä T ŠE-FI EE I FÄ	P[ ÄÖ [ { { ^ } • Ä € EEEDEEÄ T ŠE-FI FEE Ä	
EEEEÄ	P^, ÄÖ   • ä ^ d ^ Ä ^ & @ [   * * Ä ÜääÄ HÄ I I HÄ UÄ Ï ÄÜÄ HÄ I Ä	€ EEEDEEÄ	Ö ä ä Ä T ŠE-FI EE I FÄ	P[ ÄÖ [ { { ^ } • Ä € EEEDEEÄ T ŠE-FI FEE Ä	
EEEEÄ	Ü^~ ä^ \ ^ ) • Ä:   Ä ^   ä ä Ä Ö ^   ä ä   ä ä ^ ) • ä ä Ä Qä • d ä ä / Ö ^ ç ä ^ • Ä Ö [ ] ä ä ä * Ä Ö ]   ä ~ & c Ä	€ EEEDEEÄ	Ö ä ä Ä T ŠFEGG EE JÄ	Ö [ { { ^ } • Ä € EEEDEEÄ T ŠFEGG EÄ HÄ	
EEEEÄ	Ü^ ç ä ä } Ä - Ä @ Ä   ä Ä   • Ä Š ä ä Ä ÜääÄ GÄ Ï ÄÜÄÏ GÜ Ä	€ EEEDEEÄ	Ö ä ä Ä T ŠEJHFFEEJHÄ	P[ ÄÖ [ { { ^ } • Ä € EEEDEEÄ T ŠEJH HFEÄ Ä	
EEEEÄ	T ^ ä ä ä Ä ^ Ä - Ä Ö ]   ä ~ & c Ä T ä ä   ä ä Ä ÜääÄ GÄ HÄ I I HÄ Ï ÄÜÄ GÄ JÄ	FEE DEEÄ	Ö ä ä Ä T ŠEJHFFEEJHÄ	P[ ÄÖ [ { { ^ } • Ä € EEEDEEÄ T ŠEJH HFEÄ Ä	
EEEEÄ	Ö ä ä ä ä Ä • ^   ä ä & Ä:   Ä T ä ä   ä ä   ä ä ^ ) • ä ä Ä ÜääÄ HÄ I I HÄ Ä Ä Ï ÄÜÄ I HÄ	FEE DEEÄ	Ü GÄ T ŠFEGG EE I Ä	Ö [ { { ^ } • Ä FEE DEEÄ T ŠFEG EEEÄ	
EEEEÄ	Ö [ { } ä ä ä Ä Ä ä c Ö c Ä V ä ä • ]     ä ä } Ä ä c Ä Üää ä ä ä • ä ä ä Ä c @   Ä V ä ä • ]     ä ä } Ä ä c Ä Ö ^ ^ ) ä ( ^ ) • Ä ÜääÄ FÄ Ï ÄÜÄÏ JÄ	FEE DEEÄ	Ü GÄ T ŠFEGG EE I Ä	Ö [ { { ^ } • Ä FEE DEEÄ T ŠFEG EEEÄ	

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0001 EFA	U&^!a:AU^~a\ (^) o A: I A U   ca  ^AOa * ^ AO } caa } a * A O' ]   a' & oT ae: aA UaoAHEA I eAUAGEFA	Ei FFFDEEi A	Oa aA T SEJHFFEEJHA	P[ AO[ { { ^ } o A EFDI DEFEA T SEJH HFEG A	
0001 EGA	T a^aaAA^A -AO' ]   a' & oA T ae: aAUA^ * ) aa } A -A U  ^&aa c AO } aa * AA UaoAH A	Ei BUBDEEi A	Oa aA T SEJHFFEEJHA	P[ AO[ { { ^ } o A EFDI DEFEA T SEJH HFEG A	
0001 EHA	Q&^ae^aaAO[ ] d   . A: I AUa E Ua } aa a } oUaa a a a } A U  ^! & . A UOAU! a^! AOEEi E	FGFFDEEi A	Saa^ . ^A O[ ] aa a } A T Sei Hei eFi AA	P[ AO[ { { ^ } o A FFDEEi A T Sei Hei ei i FA	
0001 EFA	T a[   AO (^) a ( ^ ) o A Uao A GEFAHEFAHEFAi EA eA } aA I eA	EHEi DEEJA	Oa aA T SEJHFFEEJHA	P[ AO[ { { ^ } o A EFDI DEFEA T SEJH HFEG A	
0001 EGA	Paa } aAU  ^! & A! a a } a * A U^ . c{ AU! a a a } A U^ ~ a\ (^) o A UaoAHGA aCA^ ^! ^ & A: A UaoAGEAG ] ^ } aaAOA I FAUAi i i i A	EHEi DEEi A	Oa aA T SEJHFFEEJHA	P[ AO[ { { ^ } o A EFDI DEFEA T SEJH HFEG A	
0001 EHA	Paa } aAU  ^! & A! a a } a * A U^ . c{ AA UaoAGEA I FAUAi i i i EA GAUA JFi GA	EFDFFDEEJA	Oa aA T SEJHFFEEJHA  Saa^ . ^A O[ ] aa a } A T Sei Hi GeFi JA	P[ AO[ { { ^ } o A EFDI DEFEA T SEJH HFEG A  P[ AO[ { { ^ } o A FGDEEi A T Sei Hi Hei Hi A	
0001 EFA	T a^aaAA^A -AO' ]   a' & oA T ae: aAUA^ * ) aa } A a } a AO } aa a a a } . A UaoAHGA aAH A I GAUAi Fi i EA i Gei A	FEBUDEEFA	U! [ ] [ . ^ aA T SFEGG eei i A	O[ { { ^ } o A FEFDI DEFEA T SFEG EEGEA	
0001 EGA	Oe\ { ] a } . AO[ { Saa^ } . a * EA O^ ^! a Saa^ . ^ . EA aA Oa da^ a } A -AO' ]   a' & oA T ae: aAUA^ * ) a * A } aA U^ ]   a * AU^ ~ a\ (^) o A UaoAHGAHEFAHEFAi EA I GAUAi i i HA	FGFi DEFEA	U! [ ] [ . ^ aA T SFEGG eei i A	O[ { { ^ } o A FEFDI DEFEA T SFEG EEGEA	
0001 EHA	U^ ~ a\ (^) o A: I AO } a a^ aA O^ -a aa } A -AO' ]   a' & oA T ae: aA Uao A GEFAHEFAHEFAi EA i EA I FAi EA I GAUAi i i i A	FFDEEFA	U! [ ] [ . ^ aA T SFEGG eei i A	O[ { { ^ } o A FEFDI DEFEA T SFEG EEGEA	

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0001 E A	Uia^i[Q ] [ . a * Á 0 a * ^ i ] i a q * Á U ^ ~ a ^ { ^ } o Á a ^ á O i a a a P a q i ^ Á Ú ^ & i a : Á @ & Á Ú ^ ~ a ^ { ^ } o Á i Á W ^ . & i a a O B & . . Á Á Ó ^ i a a Á a a a a a ^ Á T a e i a a Á P Ú O Á i a ^ i Á O E i E i Á i G U Á i e i F Á	e i e i e e i Á Š a ^ . ^ Á Ô [ ] á a a } Á T Š e i F F H e i i i Á T Š e i F F i e i H J Á	P [ Á O [ { { ^ } o Á e i e e e e i Á T Š e i F G H e i H Á		
0002 E A	U & ^ ] a a i ) a Á [ . ^ Á U ^ & i a . E Á Š a a i a * Á O [ ] a a ^ i . E a a Á V [ a a Á O ^ & a ^ Á O [ . ^ Á Ö ~ a a ^ ) a Ú a a F J E a Á i G U Á i e i H Á	e e i e e f f Á Ú i [ ] [ . ^ á Á T Š F e G G e e i i Á	Ô [ { { ^ } o Á F e e e e e Á T Š F e G e e G e Á		
0003 E A	T ^ a a a Á ^ Á Á O ] i [ a ~ & Á T a e i a a Á Á e o i a a a Á ^ Á Á Ô i a a a a } Á Ú a a i Á i i Á U Á H e i F Á	e i e e e f g Á Ú i [ ] [ . ^ á Á T Š F e G G e e i i Á	Ô [ { { ^ } o Á F e e e e e Á T Š F e G e e G e Á		

FÁ Ú O Ú Á ^ a e i ^ i a Á O e a ^ a i a e \ a a [ ^ . Á [ a a ^ a a ^ Á a ^ . ^ . Á ^ a b & a Á @ . ^ Á ^ ~ | a a } . Á i a \* Á a a ^ a , E Á  
 G Á Ú Á a a Á i Á i [ ] [ . ^ á & a a ^ . Á a a a a Á ^ e Á