NRRC Stakeholders Guidelines

Kingdom of Saudi Arabia

Application for Authorization of Use of Radiation Sources in Geophysical Exploration Practice

NRRC-SG-011



2023

Stakeholder Guideline

 $\label{eq:application} \mbox{ Application for Authorization of Use of Radiation Sources in Geophysical Exploration Practice 2023 $NRRC-SG-011$$



Stakeholder Guideline for Application for Authorization of Use of Radiation Sources in Geophysical Exploration Practice

Preamble

In accordance with the provisions of the NRRC's approved Regulations, this stakeholder guideline describes criteria and/or techniques that are considered appropriate for satisfying the requirements stipulated in the NRRC's regulations.

This stakeholder guideline has been prepared on the basis of International Atomic Energy Agency (IAEA) standards, as well as the and the international best practices and the experiences of similar international regulatory bodies, and in accordance with the Kingdom's international commitments, and it has been approved by the NRRC's CEO resolution No. 1382 dated 16/07/2023.

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1. Purpose

Nuclear and Radiological Regulatory Commission (NRRC) has developed an effective regulatory framework for the safe and secure authorization of well logging practice throughout its life cycle. Under the regulatory framework, the prime responsibility for safety and security within well logging practice lies with the authorized person.

The purpose of this guideline document is to give the applicant and/or the authorized person a clear and specific guidance on the submission for the purpose of Well Logging authorization that include the following:

Use of radiation sources in geophysical exploration (sealed source
 X-ray systems).

2. Scope

This guideline is addressed to well logging facilities and activities, in particular, will address the management system, radiation protection program, safety and security aspects of well logging practice, including use, storage and transport. This will include well logging work that uses radiation sources, both in the authorized facility and outside facilities. However, it is considered appropriate that a graded approach in the application of the requirements will be taken into account and should be adapted to the risks inherent to each facility.

This guideline includes the required information relating to radiation safety and security by the NRRC in order to verify the adequacy of the proposed safety and security measures as part of the authorization process.

This guideline applies for new authorization (License issuance), renewing the license as well as the license amendment.

3. Definitions

Assessment

The process, and the result, of analyzing systematically and evaluating the hazards associated with sources and practices, and associated protection and safety measures.

Radiation generator

A device capable of generating ionizing radiation, such as X-rays, neutrons, electrons or other charged particles, that may be used for scientific, industrial or medical purposes.

Quality control (QC)

Part of quality management intended to verify that structures, systems and components correspond to predetermined requirements.

Source changer

A device designed and used for replacement of sealed sources in radiographic exposure devices, including those also used for transporting and storage of sealed sources.

Storage container

A container in which sealed sources are secured and stored.

Controlled area

A defined area in which specific protection measures and safety provisions are or could be required for controlling exposures or preventing the spread of contamination in normal working conditions, and preventing or limiting the extent of potential exposures.

Supervised area

A defined area not designated as a controlled area but for which occupational exposure conditions are kept under review, even though specific protection measures or safety provisions are not normally needed.

4. Abbreviations

Abbreviation	Definition
NRRC	Nuclear and Radiological Regulatory Commission
RPP	Radiation Protection Program.
RSO	Radiation Safety Officer.
QC	Quality Control.
SP	Security Plan

5. General and Administrative Information

The applicant should fill and sign the application form.

6. Integrated Management System

6.1. Management structure and responsibilities

The applicant should provide the following:

- Describe overall organizational system and integrated management system assuring that protection and safety and security are effectively incorporated into the overall management system of the applicant.
- Describe and clearly define responsibilities for radiation safety and security for the following parties as appropriate:

RSO(s), person responsible for security, workers, itinerant workers, radiation safety committee and clients including responsibilities for cooperation and consultation.

- Provide security roles and responsibilities.

Document the assignment of all roles and responsibilities with respect to the security of radioactive material, including the roles and responsibilities of the following:

- Site leadership, management, and supervisors.
- Positions directly responsible for the security of radioactive material.
- Positions with responsibility for regulatory matters, including any
 positions such as the licensee, radiation safety officer, security personnel, advisers, guards, and other security related positions specifically required by regulation. Provide an organization chart showing the staffing structure with lines of authority and supervision to
 demonstrate how the security organization and responsibilities fit
 within the overall site organization.

6.2. Description of regular assessment of protection, safety and security

- The applicant should verify the compliance by providing description of regular assessment of protection and safety and security such as Quality Control (QC) program and plans for regular reviews.

6.3. Confirmation of the procedures and programs

- The applicant should confirm by affirmation by the applicant and/or submittal of the following procedures and programs to the NRRC.
- Radiation source inventory, supply of sources, prior assessment of the radioactive sources and radiation generators and inventory of disused sources.
- Education, training and competence of the staff and their training, retraining, and informing.
- Investigation of incidents and accidents.
- Emergency preparedness and response.
- Control of modification(s) of facilities, equipment, and activity.
- Management of disused sources and depleted uranium if applicable
- Safe transport.
- Import and export of radioactive sources.
- Control of visitors.
- Program for the improvement of the integrated management system.

7. Technical Information

7.1. Information on radiation sources

- 7.1.1. Provide information on well logging equipment, e.g., source container(s) or device(s) and well logging tools in which a radioactive source is to be used. (If applicable)
 - The applicant should provide the following:
 - Manufacturer of the well logging equipment.
 - Model of the well logging equipment.
 - Serial number of the well logging equipment.
 - Design, manufacturing and testing of the well logging tool, source containers (i.e., used, and spare containers, source holders, remote handling tools, shutters, safety mechanisms and housing systems, etc.)
 - Demonstrate existence of locking mechanism to ensure that the source is safely retained in the storage container.
- 7.1.2. Provide information on the radioactive sources (on all non-exempt sources, including sources for checking equipment and calibration sources): (If applicable)
 - Radionuclide.
 - Model.
 - Source serial numbers.

- Source activity and reference date.
- Manufacturer of the source.
- Supplier of the source.
- Attach special form certificate for the radioactive source.
- Design, manufacturing, and testing of the source.
- Leak test.
- Working life of the source given by the manufacturer.
- Certificate for sealed radioactive source.

7.1.3. Provide details about depleted uranium.

- The applicant should provide details about depleted uranium (DU) used for well logging equipment and the mass of the depleted uranium (if any)

7.1.4. Provide details about source changers and storage containers.

- The applicant should provide details about source changers and storage containers:
 - Dose levels requirements and labelling requirements.
 - Safety of changer and storage containers.

7.2. Description of the facility / facilities

7.2.1. Radioactive source storage:

- Layout of the radioactive source storage facility.
- The applicant should provide a layout by using a scale enabling analysis of storage characteristics, e.g., entrances, doors, roof, floors, penetrations, and adjacent offices or buildings. In particular, all construction materials may be specified, e.g., material, thickness and density. Specify which sources and equipment given before will be stored in the storage area. In particular, specify maximum capacity of the storage.
 - Shielding calculation and assumptions used.
- The applicant should demonstrate that design and shielding as well as assumptions used (e.g., workload and occupancy factor) took into account radiation fields produced by all sources to be stored. Demonstrate that doses are below dose limits, dose constraints for workers and member of the public are established, and doses are optimized to be as low as possible.
- Safety features.
- The applicant should specify position of all technical safety systems, e.g., monitors, sensors, access control

measures, barriers, detectors causing warning signals and notices.

- The applicant should describe design and function of safety and warning system.
 - Controlled and supervised areas.
- The applicant should specify the boundaries of controlled and supervised areas.

7.2.2. Calibration areas.

- The applicant should demonstrate that a specific area has been designated in facility for calibrating the logging tools containing radiation sources. Specify in detail how calibration is going to be conducted, e.g., establishment of controlled and supervised areas, use of warning signals and notices in a language understood by person at the location, establishment of all other precautions before and during calibration works.
- The applicant should specify how the people will be informed when calibrations are planned and performed.
 Demonstrate that radiation monitors are used. When calibration cannot be performed in the designated area.
 Demonstrate that security is ensured.

7.2.3. Location for site well logging works.

- The applicant should specify in detail how site well log-

ging works are to be conducted, e.g., establishment of controlled areas, use of warning signals and notices in a language understood by person at the location, establishment of all other precautions before, during and after the works.

- The applicant should specify use of logging tools containing radiation sources and any radiation sources to be available at the site, monitoring equipment, personal dosimeters and alarm dosimeters, warning signals and notices, and emergency kit.
- The applicant should demonstrate that radiation monitors are used.
- The applicant should Demonstrate that security is ensured.
- The applicant should demonstrate that arrangements are in place for the transport of radioactive source(s). Specify the safety training provided to the drivers as well as data related to vehicle to be used.

7.2.4. On-site radioactive source storage.

- The applicant should provide procedures requiring appropriate arrangements to be established with the site operator ensuring that the same level of protection as in the user's source storage is granted at the temporary onsite source storage in the operating organization's main base.

- The applicant should provide and describe the basic elements of the layout of a typical temporary storage of radioactive source in remote locations and specify maximum capacity of the storage.
- The applicant should demonstrate that doses are to be kept below dose limits, and dose constraints for workers and member of the public are established and doses are optimized to be as low as possible.
- The applicant should demonstrate that controlled and supervised areas are to be put in place.
- If the well logging vehicle is to be used as temporary storage of radioactive sources, the applicant should specify all safety and security systems as well as assumptions used in the assessment of exposures of workers and members of the general public and demonstrate that controlled and supervised areas are to be put in place.
- The applicant should demonstrate that security functions of detection, delay and response are ensured.

7.3. Technical information of radiation monitoring equipment:

The applicant should provide and demonstrate the following equipment:

- Portable survey meters.
- The applicant should demonstrate suitability and calibration of portable survey meters.

- The applicant should specify their use and number, e.g., specify that survey meter(s) used for well logging are suitable and the applicant has sufficient number of portable survey meters.
- Personnel monitoring devices are provided to all workers.
- The applicant should demonstrate that following functions are in place: personal dosimetry, direct reading, and alarming. Specify all technical information.

7.4. Safe and secure management and control of radiation sources once it has been decided to take them out of use.

- The applicant should demonstrate that all disused sources, including depleted uranium, are managed in line with safety requirements, e.g., demonstrate that storage(s) for disused sources are designed and controlled applying optimization and dose limitations, and that management of the storage(s) includes all safety and security precautions.

8. Safety Assessment

8.1. The safety assessment consideration

- The safety assessment should include consideration of the following:
 - The dose rates from shielded and unshielded radioactive sources and from neutron generators, as appropriate.

- The exposure of well logging engineers, other workers and the public from normal well logging operations, and potential exposures from reasonably foreseeable incidents (including exposures due to loss of shielding, due to contamination from a damaged radioactive source, and from other scenarios, including very low probability events).
- Limits and technical conditions for operation of the well logging source.
- Ways in which structures, systems, and components, as well as procedures relating to protection and safety, might fail or might otherwise lead to potential exposures, and the consequences of such failures or potential exposures.
- Ways in which external factors could affect protection and safety.
- Ways in which operating errors and human factors could affect protection and safety.
- Evaluation of the implications of any proposed modifications for protection and safety.
- Any uncertainties or assumptions, and their implications for protection and safety.

8.2. The safety assessment basis for decision making.

- The safety assessment should be used by the licensee to pro-

vide a basis for decision making in relation to the following:

- The engineered control measures that are necessary for safety.
- The administrative controls that are necessary for safety, for example the development of safe working procedures (local rules) to be implemented for storage, operation, maintenance of a source inventory, servicing and maintenance, and management of disused sources.
- Procedures for designating controlled areas and supervised areas.
- Any measures necessary for the protection of the public.
- The assessment of occupational exposure (gamma and neutron radiation, as appropriate).
- The training program for well logging engineers and other workers.
- An effective emergency preparedness and response program to manage reasonably foreseeable events (including very low probability events). This should include information on: reasonably foreseeable incidents, the measures necessary to minimize the likelihood of occurrence of such incidents and the necessary emergency arrangements (including emergency plans and procedures, and emergency equipment).
- The security of radiation sources used in well logging, with the objective of deterring, delaying, detecting, and responding to the theft of sources.

8.3. Reviewing the safety assessment.

- The safety assessment should be reviewed annually and whenever any of the following factors apply:
 - When safety might be compromised or affected as a result of modifications to facilities or activities.
 - When the acquisition of a new radiation source or a source with different characteristics is planned.
 - When operating experience or the investigation of incidents, failures or errors indicates that current safety measures are invalid or are not fully effective.
 - When significant changes to relevant standards, regulations or guidance have been made or are envisaged.
- The operating organization should ensure that the safety assessment reflects current working practices and that no changes have been overlooked.

9. Radiation Protection Program

 The applicant should provide radiation protection program as follow:

9.1. Protection of Workers

9.1.1. Education and training of workers.

- The applicant should specify names, qualification, education, training, and retraining.

- The applicant should describe how staff (including assistants and trainees) are trained and qualified.

9.1.2. Personal dosimetry.

- The applicant should specify and provide the personnel dosimetry service and arrangements related to monitoring of personal doses.
- The applicant should provide the results of the review on past occupational doses. Provide workers' (including itinerant) records of past occupational exposure if not already recorded in the registry of occupational doses.

9.1.3. Workers' health surveillance.

- The applicant should specify programs for health surveil-lance.

9.1.4. Itinerant workers.

 The applicant should describe the allocation and documentation of the responsibilities of the employer and the applicant for safety and protection of itinerant workers.

9.1.5. Arrangements for the Radiation Protection Program (RPP).

- The applicant should demonstrate that all elements of the RPP are in place, e.g., provide a copy of a RPP:
 - Assignment of responsibilities for the RPP.

- Designation of controlled areas or supervised areas.
 - * The applicant should specify designation of controlled and supervised area using safety assessment and measured dose rates at working room(s)/area(s), storages(s).
 - * The applicant should demonstrate appropriate managing of labels, marks, and notices.
- Practice specific local rules.
 - * The applicant should demonstrate that local rules applicable for workers are prepared for all processes of the applicant and that an adequate number of workers is involved in the practice.
 - * The applicant should specify roles and responsibilities as well as demonstrate that supervision of processes is taking place.
 - * The applicant should demonstrate that rules, labels, and marks are in a language understood by those for whom they are intended Workplace and area monitoring program.
 - * The applicant should demonstrate that the necessary amount of radiation monitoring equipment is available and specify their technical specification, selection, calibration, maintenance, testing and use of radiation monitoring equipment. Demonstrate

that monitoring program takes into account all processes of the applicant, e.g., use and maintenance of radiation equipment, accepting packages with new radioactive sources and preparing packages for transport.

- Personal protective equipment.
 - * The applicant should demonstrate that need to rely on administrative control and personal protective equipment for protection and safety is minimized giving the priority to engineering controls.
 - * The applicant should demonstrate that appropriate personal protective equipment is provided, and arrangements are made for its proper use, testing and maintenance.
- Record and reporting of information.
 - * The applicant should describe the system for recording and reporting all information related to exposure control, decisions regarding measures for occupational radiation protection and safety as well as individual radiation monitoring.
- Audit and review of the RPP and the Security Plan (SP).
 - * The applicant should specify the methods for periodic auditing and review of implementation of the RPP and SP.

9.2. Protection of the Public

9.2.1. Procedures of protection and safety to protect members of the public:

- The applicant should describe the system of protection and safety to protect members of the public.
- The applicant should demonstrate that optimization of radiation protection of public is in place.
- The applicant should demonstrate that assessment, control, and surveillance of external exposure of public are in place, i.e., use of dose constraints for the member of the public. Provide assumptions used to assess external exposure of public.
- The applicant should describe training of personnel having functions relevant to protection and safety of members of the public. Demonstrate that monitoring program and management of records are in place.
- The applicant should describe the use of signs, labels, marks, and notices to be noticed by members of the public. Confirm that they are in a language to be understood by members of the public. They are in a language to be understood by members of the public.

10. Emergency Preparedness and Response Plan

10.1. The content of a basic emergency plan

- The applicant should ensure the content of a basic emergency plan includes the following:

- Advice on when to implement the emergency plan.
- Prior training as necessary for workers who will be implementing the procedures.
- Description of, and information on, the availability of emergency response equipment.
- Technical data and data relevant to radiological protection for each situation.
- Procedures to be followed at various stages, specific to each type of emergency identified:
 - Initial stage, to contain the situation.
 - Planning stage, to plan and rehearse the recovery stage.
 - Recovery stage, to regain control of the situation.
 - Post-emergency stage, to return the situation to normal.
 - Reporting stage: preparation of a report, including an assessment of doses.
 - Referral to medical experts following overexposure, if indicated.
- Identification of persons authorized to implement the various stages of the plan.
- Identification of all persons and organizations who should be contacted as necessary at the various stages of the plan,

as well as the relevant telephone numbers, fax numbers and email addresses.

10.2. Reporting

- A report of an incident or an emergency should include the following:
 - A description of the incident or emergency, with as much detail as possible of the specific equipment involved. The details should include model numbers and serial numbers wherever possible.
 - Environmental conditions at the time of the incident or emergency, with particular reference to whether or not these conditions played any significant part in causing the emergency or incident or affecting the outcome.
 - The specific cause of the incident or emergency.
 - Details of actions taken to regain control of the situation and to restore conditions to normal, with special reference to any actions that were notably beneficial or detrimental.
 - The training and experience of the personnel involved.
 - An assessment and summary of the doses received by all affected persons.
 - Recommendations made with the aim of preventing similar incidents and emergencies in the future and

mitigating the consequences if a similar or related incident or emergency were to occur.

10.3. Development of Emergency Plans

- The applicant should develop the emergency plan and each of which should be addressed by the licensee:
 - Identification of potential incidents during well logging work, followed by an evaluation of the associated risks.
 - Development of emergency plans and procedures for dealing with the risks identified.
 - Specification and acquisition of emergency equipment.
 - Training in implementing the emergency plan and procedures, including training as necessary in the use of emergency equipment.
 - Exercises at appropriate intervals to test and evaluate the implementation of the emergency plan.
 - Periodic reviews and updates of emergency plans.
 - Reports and notifications of incidents and emergencies.

11. Radioactive Sources Security Plan

11.1. Assignment of radioactive material to category and security levels.

- The applicant should identify and explain the basis for the categorization of each radioactive material and its associated security level.

11.2. Site description.

- The applicant should describe the physical features of the site on which the practice is conducted and its surrounding environment, including diagrams and scale floor and building drawings and photographs. This information must include:
 - The location and layout of the site, particularly indicating areas accessible to the public, roads and parking areas, nearest public thoroughfares, central security office, building and site perimeter, access points, and physical barriers.
 - The site's surrounding environment such as industrial, commercial, residential, or other uses; indication of distances to nearest police stations and other response services; proximity to other buildings and roads; and other features of security or operational interest such as other facilities with hazardous materials.

11.3. Operational description.

- The applicant should describe site operations in relation to the practice, including working and non-working hours; the number and type of staff involved in the site's operations; and the typical number, type, and frequency of other people, such as visitors, public, customers, service personnel or contractors, who may be at the site during scheduled operations or at any other time.

11.4. Security training and qualification.

- The applicant should provide the following information:
 - Requirements for qualification of staff with security responsibilities.
 - Training to be provided to each individual, including the required initial, specialized, advanced, or refresher training for each position with security responsibilities; security awareness training for all staff; and other relevant, specific, on-the-job training such as procedures and work instructions.
 - Provider(s) of the identified training and how frequently each part of training must be conducted.
 - How training records that document satisfactory completion of all security related training are established and maintained.

11.5. Access authorization.

- The applicant should describe the process used for authorizing personnel who need unescorted access to radioactive source locations, secured areas, and/or security sensitive information in order to perform their duties (which may or may not be directly related to security), including how the following functions are performed:
 - Identify the positions requiring unescorted access.
 - Verify individuals holding the identified positions are trustworthy.

- Verify individuals holding the identified positions have the necessary training.
- Perform timely withdrawal of access for individuals who no longer require it.
- Conduct periodic review and re-evaluation for particular circumstances, such as withdrawing access authorization when personnel or positions no longer have need for unescorted access, transfer of job responsibilities, or termination of employment.
- Maintain up to date records of personnel authorized for unescorted access.

11.6. Information protection.

- The applicant should describe the measures for protecting information whose unauthorized disclosure could compromise security of radioactive material, including the following:
 - The information that needs protection.
 - How the protected information is identified, such as the
 use of markings or other designators that will ensure
 all users of this information recognize it as requiring
 protection.
 - The forms of protected information such as paper documents, electronic media, or video recordings.
 - Where the protected information is stored and who has custody of it.

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- Who has access to sensitive information and how is that access determined.
- The protection measures in place to prevent unauthorized access when the information is being used or is being stored (for example physical protection, encryption).

11.7. Maintenance program.

- The applicant should describe the program for maintaining security equipment to ensure continuous and reliable operation.

11.8. Threat information.

- The applicant should describe the types of information on threat provided, and how it is provided.

11.9. Security assessment methodology.

- The applicant should describe the process or methodology used to design the security system and assess its vulnerabilities, taking into account the threat information provided.

11.10. Security system design.

The applicant should describe how the security system has been designed to provide the level of protection required, taking into account the graded approach and principles of defence in depth and balanced protection. Indicate how each secured area and associated radioactive material are protected by detection, delay, and response measures in an integrated and balanced way. Identify the types of equipment and systems installed and their location.

11.11. Access control.

- The applicant should describe the physical measures for controlling access, including:
 - How personnel are physically controlled at each control point to limit access only to authorized persons according to the access authorization procedure and to prevent unauthorized access.
 - Specific media used to authenticate the identity of authorized persons such as key card, personal identification number, biometric device, or a combination.
 - Procedures to be followed by authorized persons to access a secured area, including application of the two-person rule, where relevant.

11.12. Detection, assessment, and delay measures. For each controlled or secured area, the applicant should describe:

- Means of detection, including intrusion detection systems and observation by site personnel.
- Method of assessment, including people and equipment supporting the assessment.
- Delay measures used to increase adversary task time relative to response time.

11.13. Procedures for key and lock control.

The applicant should describe the procedures used for control of all keys, locks, combinations, passwords, and related measures used to control access to secured areas and security systems. Identify who is responsible for changing access control measures and the specific conditions that require them to be changed, such as the compromise of a combination or password, loss of a security key, or termination of a staff member's access.

11.14. Procedures for accounting and inventory.

- The applicant should describe how the site performs periodic accounting for radioactive material, including:
 - Verification method used, such as a physical check, remote video monitoring, examination of seals or other tamper indicating devices, or radiation measurements.
 - Records generated indicating results of each verification, when, by whom, and by what method.
 - Requirements for corrective actions and reporting if the presence of radioactive material cannot be verified.
 Also describe how the site establishes and maintains an inventory of its radioactive material.

11.15. Procedures for receipt and transfer of radioactive material.

- The applicant should describe the procedures for ensuring that security and control of a radioactive source is maintained when it is being received from outside the site and when it is transferred to another authorized person.

11.16. Security event reporting.

- The applicant should describe how security events are reported to the operator's security organization. Describe how events are documented, who is responsible to document the event, and subsequent external reporting requirements.

11.17. Security during emergencies and contingencies.

 The applicant should summarize arrangements and actions to be taken during non-security emergencies or other contingency situations to ensure the protection of the radioactive material is maintained.

12. Related documents and files

Document Name	Document Type	Document Number	Relation to the guideline
Radiation Safety	Technical Regulation	NRRC-R-01	This Regulation set out the general safety requirements in ensuring protection of people and the environment against the harmful effects of ionizing radiation and for the safety of radiation sources.in addition, this regulation harmonize the requirements applicable in the Kingdom with the international best practices in order to achieve the highest standards of safety in activities and facilities that give rise to radiation risks

Notification on and Authorization of Facilities and Activities with Radiation Sources	Technical Regulation	NRRC-R-02	Prescribes the general requirements for notification on and authoriza- tion of activities, facilities and prac- tices with radiation source, nuclear material and/or ore containing ura- nium and thorium in the Kingdom
Safe Transport of Radioactive Materials	Technical Regulation	NRRC-R-15	This regulation is to prescribe requirements that shall be fulfilled to ensure safety, security and to protect persons, property, and the environment from any harmful effects of radiation on the transport of radioactive materials or nuclear material.
Management of Radioactive Waste	Technical Regulation	NRRC-R-16	This regulation sets out the safety objectives, criteria and requirements for the protection of human health and the environment that shall be applied to the activities and the requirements that shall be met to ensure the safety of such activities and facilities.
Security of Radioactive Material	Technical Regulation	NRRC-R-17	This regulation that addressed security of radioactive material, associated activity, and associated facility against unauthorized removal of radioactive material and sabotage performed with the intent to cause harmful radiological consequences

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Kingdom of Saudi Arabia

