Pacific Gas and Electric Company

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PG&E Letter DCL-00-086

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 50-323, OL-DPR-82
Diablo Canyon Unit 2
License Amendment Request 00-04
Revision of Technical Specification 3.5.2 - Increase in Charging Pump Completion Time During Unit 2 Cycle 10 from 72 Hours to 7 Days

Dear Commissioners and Staff:

Enclosed is an application for an amendment to Facility Operating License No. DPR-82 in accordance with 10 CFR 50.90. This license amendment request (LAR) proposes a one-time change to Technical Specification 3.5.2, "ECCS - Operating," Action A, to increase the allowed completion time for centrifugal charging pump (CCP) 2-1 during cycle 10 of Unit 2, from 72 hours to 7 days. This change will allow for a potential on-line repair or a potential replacement of CCP 2-1. This pump is currently experiencing elevated vibration levels due to a structural resonance in the outboard bearing support structure and has been on an increased testing frequency since May 1996 due to high vibration.

Since there is no immediate safety concern and pump vibration levels are acceptable for continued operation, PG&E requests that this LAR be assigned a medium priority for review and approval. However, if vibration levels were to increase such that CCP 2-1 became inoperable, PG&E would request that this LAR be reviewed on an emergency basis. This would eliminate the need for enforcement discretion.

PG&E requests that the amendment be made immediately effective upon issuance by the NRC.

Sincerely,

Lawrence F. Womack

NRR-057

A001

cc: Edgar Bailey, DHS
Steven D. Bloom
Ellis W. Merschoff
David Proulx
Diablo Distribution

Enclosures
KJS

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of PACIFIC GAS AND ELECTRIC COMPANY Diablo Canyon Power Plant Unit 2	)	Docket No. 50-323 Facility Operating License No. DPR-82

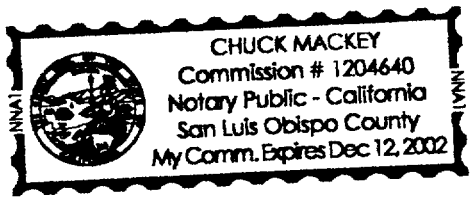
AFFIDAVIT

Lawrence F. Womack, of lawful age, first being duly sworn upon oath says that he is Vice President - Nuclear Technical Services of Pacific Gas and Electric Company; that he is familiar with the content thereof; that he has executed license amendment request (LAR) 00-04 on behalf of said company with full power and authority to do so; and that the facts stated therein are true and correct to the best of his knowledge, information, and belief.

Lawrence F. Womack
Vice President
Nuclear Technical Services

Subscribed and sworn to before me this 2nd day of June, 2000.

Notary Public
State of California
County of San Luis Obispo



REVISION OF TECHNICAL SPECIFICATION 3.5.2 - INCREASE IN COMPLETION TIME DURING UNIT 2 CYCLE 10 FROM 72 HOURS TO 7 DAYS

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request (LAR) proposes to revise Technical Specification (TS) 3.5.2, "ECCS - Operating," Action A, to change the allowed completion time for centrifugal charging pump (CCP) 2-1 during cycle 10 of Unit 2 from 72 hours to 7 days. In response to high CCP 2-1 vibration, planning has been done for replacing the CCP 2-1 discharge head and bearing housing or to change out the entire CCP 2-1. The 72-hour allowed completion time is not sufficient to accomplish such emergent repairs on an inoperable CCP.

The proposed TS change is noted on the marked-up copy of the applicable TS page provided in Enclosure B. The proposed TS page is provided in Attachment C.

B. BACKGROUND

CCP Vibration History and Repair Plan

In April 1996 during the Unit 2 seventh refueling outage (2R7), as part of a program to eliminate the potential of shaft cracking identified at other plants, CCP 2-1 was replaced. Routine surveillance testing, in May 1996 identified the outboard bearing vibration in the horizontal direction to be greater than the alert level of 0.325 inches/second. This resulted in the pump being placed on alert in accordance with ASME Section XI. The other bearing vibration measurements did not exceed the alert limits. A pump on alert is required to be tested every 42 days. Data collected from the required testing demonstrated that the pump bearing vibration has been between 0.174 inches/second and 0.510 inches/second. If the vibration action level of 0.700 inches/second is exceeded, the pump would be declared inoperable. However, the outboard bearing horizontal vibration level has appeared to stabilize at approximately 0.500 inches/second.

Multiple actions have been taken to try to reduce the pump vibration. This included altering the structural resonance, increasing the torque on the hold down bolts, replacing the coupling, realigning the pump and gearbox couplings, and reducing the gap between the discharge head and casing. These actions have been unsuccessful in permanently reducing the vibration below the alert level.

Based on discussions with the pump manufacturer, and investigation of similar CCP vibration problems at another plant, PG&E expects that replacement of the CCP discharge head with an upgraded design will reduce the vibration below the alert level. The upgraded head provides additional support to the outboard bearing. An upgraded head was installed to resolve a similar problem at another plant and proved to be effective in reducing the vibration. If the CCP vibration remains below the action level of 0.700 inches/second, PG&E plans to replace the pump discharge head during the Unit 2 tenth refueling outage (2R10) which is expected to begin in May, 2001. However, if the CCP vibration cannot be maintained below the action level between now and 2R10, corrective action will need to be taken prior to 2R10.

If repair to the CCP 2-1 pump needs to be performed prior to 2R10, the most desirable option is to replace the pump discharge head. However, readiness of a new discharge head is not expected to occur until August 18, 2000, at the earliest.

An alternative to replacing the discharge head is to replace the entire pump. A spare charging pump with new pump elements is available in the Diablo Canyon Power Plant (DCPP) warehouse for pump replacement.

The replacement of the discharge head is expected to take up to 5 days, and the replacement of the entire CCP pump is expected to take just under 7 days. These durations assume the replacement activities are worked on a 24-hour schedule until completion.

C. JUSTIFICATION

With one CCP inoperable, the current completion time to restore operability is 72 hours, or be in Hot Standby within the next 6 hours and in Hot Shutdown within the following 12 hours. Increasing the completion time from 72 hours to 7 days would provide a more reasonable completion time for the actions required to perform modifications to the pump or completely replace the pump.

Increasing the completion time is consistent with recommendations of NUREG-1024, "Technical Specifications - Enhancing the Safety Impact." NUREG-1024 states:

> *"Allowable outage times that are too short will subject the plant to unnecessary trips, transients, and fatigue cycling. Outage times that are too short also may result in less thorough repair and post-repair testing before equipment is returned to service."*

Maintaining the unit at power during the modification or replacement of CCP 2-1 provides the additional safety benefit of averting transitional risk associated with shutting the unit down. Averted risk has been the subject of several industry studies that have generally shown the risk of remaining at power, with specific significant equipment such as a CCP out of service, to be comparable and in most cases, less than the transition and shutdown risk.

A seven day completion time for emergency core cooling system (ECCS) equipment was previously approved for the Haddam Neck Plant. A license amendment for a seven day allowed outage time for TS 3/4.5.2 had been proposed for the DCPP SIPs in LAR 96-03 (PG&E letter DCL-96-048 dated February 15, 1996), but was withdrawn at the request of the NRC to accommodate the improved TS review.

D. SAFETY EVALUATION

Emergency Core Cooling System Description

The function of the ECCS is to provide core cooling and negative reactivity to ensure that the reactor core is protected after a design basis accident. The ECCS consists of three separate subsystems: 1) centrifugal charging (high head), 2) safety injection (SI) (intermediate head), and 3) residual heat removal (RHR) (low head). Each subsystem consists of two 100 percent capacity trains that are interconnected and redundant such that either train is capable of supplying 100 percent of the flow required to mitigate the accident consequences. Each ECCS train consists of a CCP, SI pump, RHR pump, piping, valves, and heat exchangers. The ECCS pumps are normally in a standby mode, although they may sometimes be used during normal operation. For example, the CCPs are used for normal charging. In Modes 1, 2, and 3, two independent (and redundant) ECCS trains are required to protect against a single failure affecting either train.

For high-head safety injection, both CCPs start automatically on an SI signal. Two CCPs, each with 100 percent flow capacity, are available to operate during the injection and recirculation phase following an accident to ensure that the safety injection function is fulfilled even assuming a single active failure. On receipt of an SI signal, CCP suction flow is automatically transferred from the volume control tank (VCT) to the refueling water storage tank (RWST). The normal charging path is automatically isolated on an SI signal and the ECCS injection path valves are automatically opened to provide flow to the reactor coolant system (RCS) cold legs. When the RWST water inventory is depleted to approximately 33 percent, the RHR pumps are automatically shut off and the ECCS suction is manually transferred to the containment recirculation sump to

place the system in the recirculation mode of operation. During the recirculation mode of operation, the RHR pumps provide suction to the CCPs and SI pumps. The recirculation mode of operation consists of a cold leg recirculation phase in which flow is supplied to the RCS cold legs and a hot leg recirculation phase in which flow is supplied to the RCS hot legs.

Accidents and Technical Specifications

The ECCS is credited to provide core cooling and negative reactivity after any of the following accidents:

- Loss of coolant accident (LOCA), non-isolable coolant leakage greater than the capability of the normal charging system;
- Rod ejection accident;
- Loss of secondary coolant accident, including uncontrolled steam release or loss of feedwater; and
- Steam generator tube rupture (SGTR).

The TS limiting condition for operation (LCO) 3.5.2 requires two independent (and redundant) ECCS trains to ensure that sufficient ECCS flow is available to meet the design basis analysis assumptions for the above accidents, assuming a single failure affecting either train. TS 3.5.2 action A.1 states that with one or more trains inoperable and at least 100 percent of the ECCS flow equivalent to a single operable ECCS train available, the inoperable components must be returned to operable status within 72 hours. The 72-hour completion time is based on an NRC reliability evaluation which has shown the impact of having one full ECCS train inoperable is sufficiently small to justify continued operation for 72 hours. During the 72-hour completion time, 100 percent of the ECCS flow required to mitigate accidents can be provided without a single failure. A single failure is not required to be postulated during the completion time.

A completion time of 72 hours is usually sufficient to perform necessary preventive or corrective maintenance required on the CCPs. However, replacement of the CCP 2-1 discharge head or replacement of CCP 2-1 is expected to require up to 7 days. Since the CCP 2-1 discharge head or pump replacement is expected to exceed one half of the TS completion time, the replacement activities will be planned to be worked on a 24-hour schedule until completion per DCPP Administrative Procedure AD7.ID4, "On-line Maintenance Scheduling." During the 7 day period, 100 percent of the ECCS flow required to mitigate accidents can be provided without a single failure. With no single failure, there are no situations in which entry into a 7 day completion time, due to an inoperable CCP 2-1, would result in failure to meet an intended safety function. In addition, compensatory actions will be taken during the replacement

activities in order to minimize the increase in risk during the 7 day period when CCP 2-1 is inoperable.

Compensatory Actions

The following actions will be taken for the CCP 2-1 outage to repair the discharge head or replace the pump to offset the negative risk impact of the CCP 2-1 outage:

- Before beginning work on CCP 2-1, the risk will be assessed per plant procedures as required by 10 CFR 50.65(a)(3) of the Maintenance Rule.
- It will be verified that CCP 2-2 and the system alignment is operable and available to provide injection flow to the reactor coolant system in the event of an SI signal.
- No elective maintenance or surveillance testing will be performed which disables the ECCS equipment (except CCP 2-1). This will maximize the availability of ECCS flow to provide the safety injection function.
- The emergency diesel generators (EDGs) will be verified to be operable. Additionally, no elective maintenance or testing will be performed on the EDGs, the 230kV or 500kV systems. This will maximize the availability of onsite AC power should offsite power be lost and ensure that power is available to all ECCS equipment.
- The risk of performing elective maintenance or surveillance testing on other risk significant systems, structures, and components will be assessed and managed for the current plant state per plant procedures.
- Very high risk plant evolutions as described in plant risk assessment procedures will be avoided.
- Elective load changes will not be performed.

These compensatory actions are being taken to assure that the CCP 2-2 pump and other ECCS equipment are operable and capable of being powered, and to minimize the possibility that the ECCS equipment will be required. The actions also minimize the possibility that risk significant equipment is lost and minimize the overall plant risk during the CCP 2-1 outage. With these compensatory actions in place, 100 percent of the ECCS flow required to mitigate accidents can be provided without a single failure.

Risk Assessment

A probabilistic risk assessment (PRA) was performed to determine the effect of extending the CCP 2-1 completion time from 72 hours to 7 days. The DCPP PRA is a full-scope, level 2 PRA that evaluates the frequency of experiencing reactor and plant damage as a result of both internal and external initiating events. While the PRA was performed for DCPP Unit 1 only, it is equally applicable to DCPP Unit 2 considering the substantial similarities between the two units. The NRC review and acceptance of the original PRA evaluation, DCPRA-1988, is summarized in the Safety Evaluation Report, Supplement No. 34 (NUREG-0675, June 1991). Much of the review of DCPRA-1988 was performed by Brookhaven National Laboratory, and the review is documented in NUREG/CR-5726. As part of PG&E's living PRA program, the DCPP PRA is updated at regular intervals to reflect current plant design and operation.

Assuming that a CCP is removed from service for the full 7 day completion time, the additional core damage frequency (CDF) added from seismic and internal event initiators is 2.8E-07 per year. The existing combined at power seismic and internal PRA model supports a 604 hour (25 days) allowed outage time for CCP 2-1. Therefore, the CCP 2-1 pump could be out of service for 604 hours in a year before it would yield an increase of 1.0E-6 per year to the core damage frequency (CDF). Per NRC guidelines stated in Regulatory Guide 1.174, this is a low risk significant configuration. The increased CCP 2-1 completion time uses less than one third of the guideline allotted amount. The change in the large early release frequency (LERF) figure of merit is even more insignificant, as the CCPs availability does not affect the dominant contributors to the LERF figure of merit. The total CDF (Internal + Seismic + Fire) is 9.97E-5 per year and the internal events (including internal flooding) contribution to the LERF figure of merit is 8.94E-7 per year.

Also, PG&E reviewed the allowable at-power out of service time of CCP 2-1 per the maintenance rule. The pump is allowed to be out of service for a total of 93 hours over a calendar year. The 7 day completion time for CCP 2-1 is intended to be used only once in order to replace the discharge head or the entire pump if the pump becomes inoperable. A worst case analysis would add the 93 hours of allowed out of service time to the 168 potential completion time hours resulting in 261 hours. As a result, the worst case CDF increase for CCP 2-1 would be 4.3E-7 per year, which is a cumulative risk increase of 2.5 percent of CDF.

Flow Balance Testing

CCP 2-1 may be repaired or replaced at power because the ECCS subsystem flow characteristics will not be altered during the repair or replacement. The following is the basis for why the ECCS subsystem flow characteristics will not be altered:

Final Safety Analysis Report Section 6.3.4.4 discusses how an ECCS subsystem is demonstrated operable during shutdown, following completion of a modification to the ECCS subsystem that alters the subsystem flow characteristics. For the CCP subsystem, a CCP is shown to be operable by performing a flow balance test to verify with a single pump running that:

- The sum of the injection line flow rates, excluding the highest flow rate, is greater than or equal to 299 gpm, and
- The total flow through all four injection lines is less than or equal to 461 gpm, and
- The difference between the maximum and minimum injection line flow rates is less than or equal to 15.5 gpm, and
- The total pump flow rate is less than or equal to 560 gpm.

In addition, the TS 3.5.2.4 Bases requires the CCP to develop an indicated differential pressure of greater than or equal to 2400 psid when tested on recirculation flow.

Replacement of CCP 2-1 was evaluated to determine whether the flow characteristics of the ECCS subsystem would be altered such that a flow balance test should be performed.

For a fluid system, such as the SI system, the flow distribution can be calculated based on the system resistance and the performance of the pumps in the system. If an actual pump performance curve and the system resistance are known, the flows of a fluid system can be calculated.

The vendor certified performance (pump head curve) of the replacement CCP 2-1 pump and impeller was determined through testing by the pump vendor. The replacement pump has never been previously used. There have been no modifications to the pump which would impact the vendor flow test. Therefore, the performance generated by the pump vendor remains applicable.

The system resistance for the high head safety injection portion of the ECCS system was obtained during the performance of STP V-15, "ECCS Flow Balance" during Unit 2 refueling outage 9 (2R9). STP V-15 establishes throttle valve positions and, consequently, system resistances to assure that the SI

system is performing within the bounds of the safety analyses criteria. Upon completion of STP V-15, the throttle valves were locked and sealed per STP V-14. There have been no changes to the high head safety injection portion of the ECCS system since this test which would impact the system resistance.

To bound expected uncertainties, the CCP 2-1 vendor performance curve was considered with a ±71 foot (i.e. ±30 psi) band about the vendor certified pump head curve. Using these pump head curves and the system resistance from the STP V-15 test performed in 2R9, the flow distributions under a STP V-15 testing condition have been calculated using the PEGISYS computer code. PEGISYS is a Westinghouse-developed computer hydraulic model that computes thermal-hydraulic calculations previously done by hand. The equations solved for hydraulic networks are the well-established and accepted Bernoulli equation, and a mass balance equation. The ECCS model is DCPP-specific, and PEGISYS has been verified and validated against actual system performance tests at DCPP. The model can be used to calculate ECCS flow distributions, system resistances, or pump performance if two of three parameters are known. In this case, the pump performance and the system resistances are known, so the ECCS flow distributions were calculated.

In order to bound the plant configuration with the replacement CCP 2-1, additional conservatisms were provided to the inputs used in the hydraulic model. The worst case instrument error was used to determine the system resistances based on the STP V-15 test results for calculating the flow distributions. Additionally, the vendor pump head curve was bounded by completing calculations for two cases to accommodate any inaccuracies in the curve: 1) adding 71 feet of head to the vendor curve across its entire range, and 2) reducing the vendor curve by 71 feet of head across its entire range.

The calculated flow distributions and FSAR Section 6.4.4.4 and TS Bases 3.5.2.4 CCP system requirements are as follows:

- The sum of the least three injection lines flow would be between 315 gpm and 323 gpm. The limit is greater than or equal to 299 gpm.
- The total flow through all four injection lines would be between 422 gpm and 432 gpm. The limit is less than or equal to 461 gpm.
- The difference between the maximum and minimum injection line flow rates would be between 3 gpm and 4 gpm. The limit is less than or equal to 15.5 gpm.
- The total pump flow rate would be between 534 gpm and 545 gpm. The limit is less than or equal to 560 gpm.

- The differential pressure on the pump miniflow would be between 2451 psid and 2529 psid near 140 gpm. The limit is greater than or equal to 2400 psid.

If CCP 2-1 is replaced without changing the position of any throttle valves, the calculated system resistances from 2R9 do not change. With the fixed system resistances and the vendor-certified performance curve for the pump, the resulting SI flow distribution was calculated and verified to satisfy the FSAR Section 6.4.4.4 criteria. Therefore, PG&E concludes that no modifications of the ECCS subsystems have been made which alter the subsystem flow characteristics such that the performance of a flow test during shutdown, in accordance with FSAR Section 6.4.4.4, would be required.

Based on the above evaluation and the conservatisms applied to the analysis, the installation of the replacement CCP 2-1 clearly meets the flow balance and pump runout requirements with adequate margin, such that the SI system flow characteristics are not altered in such a manner that would require a flow balance test per FSAR Section 6.4.4.4.

E. NO SIGNIFICANT HAZARDS EVALUATION

PG&E has evaluated the no significant hazards considerations (NSHC) involved with the proposed amendment, focusing on the three standards set forth in 10 CFR 50.92(c) as set forth below:

> *"The commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards considerations, if operation of the facility in accordance with the proposed amendment would not:*
>
> *(1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or*
>
> *(2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or*
>
> *(3) Involve a significant reduction in a margin of safety."*

The following evaluation is provided for the NSHCs.

1. *Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?*

The emergency core cooling system (ECCS) and the centrifugal charging pumps (CCPs) are designed to respond to mitigate the consequences of an accident. They are not an accident initiator, and as such cannot increase the probability of an accident.

The loss of both CCPs, due to an inoperable CCP 2-1 and a single failure of CCP 2-2, could increase the consequences of an accident. A PRA was performed to evaluate the increased consequences. The worst case risk increment due to the increased completion time for CCP 2-1 and the maximum allowed out of service time is 2.5 percent. This is a non-significant risk increase for core damage frequency (CDF). Also, there is no noticeable increase in the large early release frequency as a result of this request.

Allowing 7 days to complete the repairs and post-maintenance testing of CCP 2-1 is acceptable since the ECCS system remains capable of performing its intended function of providing at least the minimum flow assumed in the accident analyses. During the extended maintenance and test period, appropriate compensatory measures will be implemented to restrict high risk activity. The consequences of accidents, which rely on the ECCS system, will not be significantly affected.

Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?*

There are no new failure modes or mechanisms created due to plant operation for an extended period to perform repairs and post-maintenance testing of CCP 2-1. Extended operation with an inoperable CCP does not involve any modification in the operational limits or physical design of the systems. There are no new accident precursors generated due to the extended allowed completion time.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *Does the change involve a significant reduction in a margin of safety?*

Plant operation for 7 days with an inoperable CCP 2-1 does not adversely affect the margin of safety. During the extended allowable completion time the ECCS system maintains the ability to perform its safety function

of providing at least the minimum flow assumed in the accident analyses. During the extended maintenance and test period, appropriate compensatory measures will be implemented to restrict high risk activity.

Therefore, the change does not involve a significant reduction in a margin of safety as defined in the basis for any Technical Specification.

F. NO SIGNIFICANT HAZARDS DETERMINATION

Based on the above safety evaluation, PG&E concludes that the changes proposed by this license amendment request satisfy the NSHC standards of 10 CFR 50.92(c), and accordingly a no significant hazards finding is justified.

G. ENVIRONMENTAL EVALUATION

PG&E has evaluated the proposed changes and determined the changes do not involve: (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

MARKED-UP TECHNICAL SPECIFICATIONS

Remove Page	Insert Page
3.5-3	3.5-3

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS - Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

---NOTE---
In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valve(s) for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more trains inoperable. AND At least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.	A.1 Restore train(s) to OPERABLE status	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours

Insert Above

- - - - - - - NOTE - - - - - -
The Completion Time may be extended to 7 days for Unit 2 cycle 10 for repair or replacement of centrifugal charging pump 2-1.
- - - - - - - - - - - - - - -

PROPOSED TECHNICAL SPECIFICATION PAGES

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS - Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

---NOTE---

In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valve(s) for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more trains inoperable. AND At least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.	A.1 Restore train(s) to OPERABLE status	----------NOTE---------- The Completion Time may be extended to 7 days for Unit 2 cycle 10 for repair or replacement of centrifugal charging pump 2-1. ---------- 72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours