

RAS 13948

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July 26, 2007

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

July 26, 2007 (10:47am)

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

In the Matter of )  
 )  
 Entergy Nuclear Vermont Yankee, LLC ) Docket No. 50-271-LR  
 and Entergy Nuclear Operations, Inc. ) ASLBP No. 06-849-03-LR  
 )  
(Vermont Yankee Nuclear Power Station) )

**ENTERGY'S RESPONSE TO NEW ENGLAND COALITION'S SUPPLEMENT TO  
OPPOSITION TO ENTERGY'S MOTION FOR SUMMARY DISPOSITION OF NEW  
ENGLAND COALITION CONTENTION 3 (STEAM DRYER)**

Pursuant to the Atomic Safety and Licensing Board (“Board”)'s July 13, 2007 Order (Granting Motion to Defer and Setting Schedule), Applicants Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (collectively “Entergy”) provide this response to “New England Coalition, Inc.’s (NEC) Supplement to Opposition to Entergy’s Motion for Summary Disposition of New England Coalition Contention 3 (Steam Dryer)” (“NEC’s Supplement”), dated July 19, 2007. NEC’s Supplement provides no factual information or legal arguments that would render summary disposition inappropriate and provides no additional support for NEC’s previous response in opposition to Entergy’s April 19, 2007 Motion for Summary Disposition of New England Coalition’s Contention 3 (Steam Dryer) (“Entergy’s Summary Disposition Motion”).<sup>1</sup> Because NEC’s previous response provided no basis for denying summary disposition of this contention, Entergy’s Summary Disposition Motion should be granted.

<sup>1</sup> New England Coalition, Inc.’s (NEC) Opposition to Entergy’s Motion for Summary Disposition of NEC’s Contention 3 (Steam Dryer), dated May 9, 2007 (“NEC’s Opposition to Summary Disposition Motion”). NEC also filed, on May 18, 2007, an unauthorized response to the NRC Staff’s response to Entergy’s Summary Disposition Motion. The Staff moved, on May 29, 2007, to strike NEC’s unauthorized filing, and a ruling on that motion is pending.

TEMPLATE = SECY-041

SECY-02

**I. THE MAY 2007 STEAM DRYER INSPECTION RESULTS, WHILE REASSURING, ARE NOT RELEVANT TO THE ISSUES RAISED IN NEC CONTENTION 3**

**A. STEAM DRYER INSPECTIONS DURING THE CURRENT LICENSE PERIOD ARE IRRELEVANT TO CONTENTION 3 IN THIS PROCEEDING**

NEC Contention 3, as admitted by the Board, reads:

Entergy's License Renewal Application Does Not Include an  
Adequate Plan to Monitor and Manage Aging of the Steam Dryer  
During the Period of Extended Operation.

Memorandum and Order (Ruling on Standing, Contentions, Hearing Procedures, State Statutory Claim, and Contention Adoption), LBP-06-20, 64 N.R.C. 131, 187 (2006), ("LBP-06-20"), emphasis added.

By its very terms, and because of the limited scope of this license renewal proceeding, NEC Contention 3 deals solely with the adequacy of the program that Entergy proposes to implement to manage aging of the steam dryer through a course of monitoring and inspections during the license renewal period after 2012. NEC's Supplement simply questions the favorable results of the recent steam dryer inspection during refueling outage 26 ("RFO26") in May 2007, which identified no fatigue-induced cracks in the dryer, and does not address the programmatic adequacy of the measures that will be implemented during the period of extended operation. Indeed, NEC's Supplement does not even mention the aging management program Entergy proposes to implement during the license renewal period, but simply seeks to litigate the current condition of the steam dryer.

However, in admitting NEC's Contention 3, the Board emphasized that arguments about dryer performance during the current licensing period are irrelevant to this proceeding:

[S]ince Entergy's existing license continues until 2012, its application for a license renewal necessarily only involves aging management matters after that date. Steam dryer monitoring and inspection plans for the time period prior to

2012 are not directly relevant to, nor dispositive of, our ruling on NEC Contention 3 except to the extent that Entergy's license renewal application, or other materials properly before this Board at this stage in the proceeding, indicates a commitment to continue existing programs.

Id. at 189, emphasis in original.

Also, under the terms of the existing license, Entergy is required to report to the NRC the results of its post-uprate steam dryer inspections starting with the recently completed inspection during RFO26 in May 2007. See paragraph M.6 of VY license, included in Exhibit 2 to John R. Hoffman's April 18, 2007 Declaration in support of Entergy's Summary Disposition Motion ("Hoffman Decl."). Therefore, if fatigue-induced cracks were identified during those inspections,<sup>2</sup> they would be subject to review by the Staff and would need to be addressed through appropriate corrective and preventive actions, so they would not remain a concern during the license renewal period. Without any discussion of the aging management program, NEC's questioning of dryer inspections under the current license has no relevance to NEC's Contention 3 and lends no support to NEC's contention.

**B. THE ADEQUACY OF THE ANALYTICAL METHODS USED IN IMPLEMENTING THE VY EXTENDED POWER UPRATE IS NEITHER ESTABLISHED NOR DISPROVED BY THE RESULTS OF THE MAY 2007 STEAM DRYER INSPECTION**

In admitting NEC Contention 3, the Board found that the following statements in the Declaration of Dr. Joram Hopenfeld<sup>3</sup> submitted in support of NEC's petition to intervene "demonstrated a 'genuine dispute' under the standards of 10 C.F.R. § 2.309(f)(1)(vi)":

[T]he management of cracking at the steam dryer will be in accordance with current guidance per NUREG 1801, GE-SIL-644 and possibly future guidance from BWRVIP-139, if approved by NRC. No matter which guidance Entergy follows, the status of the existing dryer cracks must be continuously monitored and assessed by a competent engineer.

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<sup>2</sup> As further discussed below, no fatigue induced cracks were identified in the May 2007 steam dryer inspection, and NEC's "expert" did not opine that any were actually found.

<sup>3</sup> Declaration of Dr. Joram Hopenfeld (May 12, 2006) ("Hopenfeld Decl.").

Entergy's proposed monitoring techniques are not adequate to detect crack propagation and growth because they are not based on actual measurements of crack initiation and growth. Instead, Entergy relies on unproven computer models and moisture monitors which only indicate that the dryer was already damaged. The estimated fatigue loads on the dryer are based on theoretical calculations of two computer models: the [CFD] Model and the [AC] Model. Neither the CFD nor the ACM were benchmarked against properly scaled dryer structure and therefore their predictions are subject to large uncertainties.

LBP-06-20, 64 N.R.C. 131, 190 (2006), quoting Hopenfeld Decl., ¶¶ 18-19. However, the computer models cited by Dr. Hopenfeld were only used to estimate the peak loads on the steam dryer as part of the analysis supporting the uprate, and the proposed program for monitoring and managing the aging of the VY steam dryer during the period of extended plant operation neither requires the use of computer models nor relies on the result of analyses using those models. Hoffman Decl., ¶¶ 11, 19, 24, 30. Nothing in NEC's Supplement or its supporting "Second Declaration of Ulrich Witte" ("Witte's Second Declaration") provides any indication that VY is using the computer models in managing the aging of the steam dryer. To the contrary, Witte's Second Declaration and the materials it attaches show that VY is managing aging by visual inspections and evaluations of the appearance, orientation and size of indications in themselves and as compared to previous inspection results. This is consistent with the requirements of the current license and with the aging management plan for the dryer set forth in the VY license renewal application. See Hoffman Decl., ¶¶ 20-23, 25.

In addition, neither NEC's Supplement nor Witte's Second Declaration include any factual assertions supporting Dr. Hopenfeld's claims that the computer model stress predictions used in the uprate analysis are unreliable. Indeed, as discussed later, after having reviewed the video of the steam dryer inspections and images of the indications, the indication notification reports, the engineering evaluations of those indications, and the corrective action reports,

Witte's Second Declaration makes no claim that fatigue-related cracking is occurring. Thus, NEC's Supplement fails to provide any support for this aspect of NEC's contention.

## **II. THE RESULTS OF THE MAY 2007 STEAM DRYER INSPECTION RAISED NO ISSUES THAT WOULD PRECLUDE SUMMARY DISPOSITION OF NEC CONTENTION 3**

NEC's Supplement does not raise any issues arising from the May 2007 inspection that would require adjudication at a hearing or preclude summary disposition of the contention.

### **A. NEC'S "EXPERT" IS NOT QUALIFIED TO OPINE ON THE EXISTENCE OF FATIGUE-INDUCED CRACKS IN THE VY STEAM DRYER**

NEC's Supplement is supported solely by Witte's Second Declaration. Mr. Witte avers that his background is in the areas of "configuration management, engineering design change controls, and licensing basis reconstitution." Witte's Second Declaration, ¶ 1. He further states that his experience "has generally focused on assisting nuclear plant owners in reestablishing fidelity of the licensing and design bases with the current plant design configuration, and with actual plant operations." Id. Nowhere in his Second Declaration does Mr. Witte indicate that he has any experience whatsoever in the design, analysis, or inspection of steam dryers.<sup>4</sup> The absence of any credentials in this area makes Mr. Witte unqualified to render expert opinions on the condition of the VY steam dryer and his statements in his Second Declaration should be given no weight. See, e.g., Florida Power & Light Co. (Turkey Point Plant, Units 3 and 4), LBP-86-23, 24 NRC 108, 116 (1986); Duke Cogema Stone & Webster (Savannah River Mixed Oxide Fuel Fabrication Facility), LBP-05-04, 61 NRC 71, 81 (2005); Pacific Gas & Electric Co.

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<sup>4</sup> Also, no indication that Mr. Witte possesses any experience or qualifications with respect to steam dryer performance is found in his extensive *curriculum vitae*, attached as Exhibit A to his first Declaration in support of NEC's Opposition to Entergy's Motion for Summary Disposition of NEC Contention 4 (Flow-Accelerated Corrosion), filed on July 16, 2007.

(Diablo Canyon Nuclear Power Plant, Units 1 and 2), LBP-78-36, 8 NRC 567, 569-74 (1978).

Accordingly, NEC's Supplement is without factual or expert opinion support.

B.     NEC'S "EXPERT" PROFFERS NO OPINION THAT FATIGUE-INDUCED CRACKS WERE IDENTIFIED DURING THE MAY 2007 STEAM DRYER INSPECTION.

Mr. Witte's Second Declaration offers a number of observations, questions, and concerns relating to his review of the records (including videotapes) of the May 2007 steam dryer inspection at VY.<sup>5</sup> When all is said and done, however, Mr. Witte does not opine that any fatigue-induced cracks have developed in the VY steam dryer. The sum total of his conclusions is that "I have not reviewed analysis from which I could conclude that none of these new cracks or incidences of crack growth or change were fatigue induced." Witte's Second Declaration, ¶ 18. In other words, based on his documentation review, he cannot assert that any fatigue-induced cracks have developed at the VY steam dryer.<sup>6</sup> A statement by an expert that he cannot tell whether a deficiency exists does not support an allegation that the deficiency does exist. A

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<sup>5</sup> Mr. Witte refers to what he claims to be certain documentation inconsistencies, which are actually non-existent. For example, he states that flaws reported in four of sixteen Indication Notification Reports were further evaluated in two GE Nuclear Energy Reports, and that Entergy has not produced GE's assessment of flaws identified in the other twelve. Witte's Second Declaration, ¶ 7. Since Mr. Witte states that he reviewed all the relevant Indication Notification Reports as well as Corrective Action Reports, he is or should be aware that most inspections did not identify any discernible change in indications that had been identified in the 2005 refueling outage. Accordingly, there was no need for additional evaluations by GE. Thus, NEC's insinuation that there may be additional GE reports evaluating the indications from the 2007 outage is baseless.

Mr. Witte's assertions in paragraph 8 of his Second Declaration are similarly misleading. He states that VY Engineering Report VTY-RPT-07000-11, Rev. 2 references a 2005 GE evaluation, which he points out does not cover a new indication found in the 2007 inspection. The VY Engineering Report in question, which is part of Exhibit A to NEC's motion, evaluates that new indication and references the 2005 GE evaluation only with respect to the remainder of the indications, which were previously identified in the 2005 outage and showed no sign of growth. Once again, NEC's attempt to manufacture a documentation issue has no foundation in fact. Most importantly, despite Mr. Witte's (groundless) claims of documentation discrepancies, his Second Declaration does not point to any actual physical conditions in the steam dryer that would indicate that fatigue-induced cracks have developed.

<sup>6</sup> Mr. Witte's inability to identify any fatigue-induced cracks in the VY steam dryer is not surprising, given that experienced inspectors and analysts at VY and at General Electric Co., the steam dryer manufacturer, found no fatigue-induced cracks during the May 2007 dryer inspection. See, e.g., Attachment A hereto, Entergy's Engineering Report No. VY-RPT-07-00011 (Rev. 2, June 15, 2007), entitled "Evaluation of New RFO26 Steam Dryer Indication." (As noted above, this report is part of Exhibit A to Witte's Second Declaration. It was transmitted belatedly by NEC to the Board and parties in one of eight e-mails sent on July 24, 2007, and was included in the document transmitted as "Part 3 or 8").

party opposing summary disposition of a contention has the responsibility of providing something more than suspicions or bald assertions as the basis for any purported dispute of material fact. Private Fuel Storage, L.L.C. (Independent Spent Fuel Installation), LBP-99-35, 50 NRC 180, 194 (1999), citing Advanced Medical Systems, Inc. (One Factory Row, Geneva, Ohio 44041), CLI-94-6, 39 NRC 285, 306-07, aff'd, Advanced Medical Systems, Inc. v. NRC, 61 F.3d 903 (6<sup>th</sup> Cir. 1995).

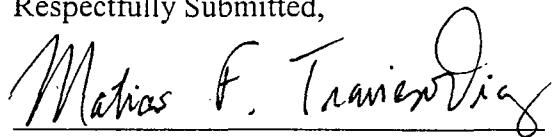
The sole basis for NEC requesting leave to file a supplementary response to Entergy's Motion for Summary Disposition was that the results of the May 2007 steam dryer inspection could contradict Entergy's contention that fatigue-induced cracking of the VY steam dryer is not occurring. See New England Coalition, Inc.'s (NEC) Motion to Withhold Decision of Entergy's Motion for Summary Disposition of New England Coalition Contention 3 (Steam Dryer), dated June 19, 2007 at 2. Neither NEC's Supplement nor Witte's Second Declaration contain anything that does contradict Mr. Hoffman's assertions that "only superficial cracks have been observed in the VY steam dryer and those cracks have not shown any measurable growth in the successive dryer inspections," Hoffman's Decl., ¶ 28, and that "fatigue-induced cracking of the VY steam dryer is not occurring." Id., ¶ 18. NEC's Supplement does not identify any relevant disputed questions of fact, nor does it provide any expert opinion that could give rise to litigable issues.

### III. CONCLUSION

Neither NEC's May 9, 2007 Opposition to Entergy's Motion for Summary Disposition nor NEC's Supplement raises issues of material fact with respect to NEC's Contention 3 that

warrant adjudication. For the reasons discussed above and in Entergy's Motion for Summary Disposition, Entergy is entitled to a decision as a matter of law on that contention.

Respectfully Submitted,



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Dated: July 26, 2007

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**Before the Atomic Safety and Licensing Board**

In the Matter of )  
                        )  
                        )  
Entergy Nuclear Vermont Yankee, LLC     ) Docket No. 50-271-LR  
and Entergy Nuclear Operations, Inc.     ) ASLBP No. 06-849-03-LR  
                        )  
(Vermont Yankee Nuclear Power Station)   )

**CERTIFICATE OF SERVICE**

I hereby certify that copies of "Entergy's Response to New England Coalition's Supplement to Opposition to Entergy's Motion for Summary Disposition of New England Coalition Contention 3 (Steam Dryer)," dated July 26, 2007, were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid, or with respect to Judge Elleman by overnight mail, and where indicated by an asterisk by electronic mail, this 26th<sup>th</sup> day of July, 2007.

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Engineering Report No. VY-RPT-07-00011 Rev -2-

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Entergy

ENTERGY NUCLEAR  
Engineering Report Cover SheetEngineering Report Title:  
EVALUATION OF NEW RFO26 STEAM DRYER INDICATION

## Engineering Report Type:

New  Revision  Cancelled  Superseded 

## Applicable Site

IP1 <input type="checkbox"/>	IP2 <input type="checkbox"/>	IP3 <input type="checkbox"/>	JAF <input type="checkbox"/>	PNPS <input type="checkbox"/>	VY <input checked="" type="checkbox"/>	WPO <input type="checkbox"/>
ANO1 <input type="checkbox"/>	ANO2 <input type="checkbox"/>	ECH <input type="checkbox"/>	GGNS <input type="checkbox"/>	RBS <input type="checkbox"/>	WF3 <input type="checkbox"/>	

DRN No.  N/A  EC 1772Report Origin:  Entergy  Vendor  
Vendor Document No.: \_\_\_\_\_Quality-Related:  Yes  NoPrepared by: Neil Fales/ N.F.  
Responsible Engineer (Print Name/Sign)

Date: 6/15/07

Design Verified/ N/A  
Design Verifier (if required) (Print Name/Sign)

Date:

Reviewed by: Scott Goodwin/ S.Goodwin  
Reviewer (Print Name/Sign)

Date: 6/15/07

Reviewed by\*: N/A  
ANII (if required) (Print Name/Sign)

Date: \_\_\_\_\_

Approved by: Larry Lukens/ L.Lukens  
Supervisor (Print Name/Sign)

Date: 6/15/07

\* For ASME Section XI Code Program plans per ENN-DC-120, if require

## Evaluation of Steam Dryer Indication

### Introduction

During RFO26 steam dryer visual inspections, flaw indications were reported in the dryer end plates for the internal vane assemblies. Most of these indications were previously identified in RFO25 and were evaluated by GE as being acceptable to leave as is per Reference 11. The intent of this paper is to evaluate one new indication identified during RFO26 and determine whether it should be accepted as is.

### Discussion

One new indication was found adjacent to weld HB-V04, located on bank B at the 0° end and is labeled as the 3<sup>rd</sup> indication on INR-IVVI-VYR26-07-10 Rev.1 (Reference 2). This indication is of similar appearance, orientation and size as those previously seen. Because of this it is being treated similar to those indications identified in RFO25. The remainder of indications on the steam dryer listed as References 1-10 were previously identified and show no signs of growth. These indications are acceptable to leave as is per GE evaluation GENE-0000-0047-2767 (Reference 11) performed in RFO25. Therefore, the one new indication described above is the only one requiring an evaluation.

It should be mentioned that not all indications identified in RFO25 were re-identified in RFO26. The reasons for this vary, but can be the limitations of the equipment, crud layers masking the surface of the indication or the technique of different examiners.

### Evaluation of Indications

GE's evaluation in RFO25 cites IGSCC as being the likely cause of most of the indications previously observed. This is based on the jagged appearance and location in the weld heat affected zone (HAZ). The unit end plates may have cold work resulting from cold forming. Cold working Type 304 material can promote initiation of stress corrosion cracks when exposed to the BWR environment. The dryer unit end plates are located in the dryer interior and are not subjected to any direct main steam line acoustic loading. Continued growth is unlikely because all of these indications appear to have stopped without propagating into the vertical weld; this is indicative of IGSCC behavior as opposed to fatigue, since weld material is more resistant to IGSCC. The flanges have experienced a near infinite number of fluctuating load cycles and if fatigue driven, more significant cracking is likely to have occurred after many years of operation. IGSCC in steam dryers has been typically limited in depth and length since in many cases it is caused by cold work or weld induced residual stress.

The dyer unit end plate, with the indication, is securely attached and captured within the structure of the steam dryer bank assembly. The vertical edges of these end plates are attached to the dryer assembly with 3/16" fillet welds, each weld approximately 48" long.

There were no relevant indications reported in these vertical welds. The geometric configuration of the unit end plates is such that the steam dryer assembly mechanically captures the upper and lower edges. The reported horizontal indications were seen in the inlet side end plate flange. The vanes prevent inspection of the central end plate surface, but inspection of the outlet side end plate flanges at both locations found no indications. If it is postulated that the end plate horizontal indications propagate across the entire 8.75" unit end plate width including both the inlet and outlet side flange, such full width, through-thickness cracks would have no structural impact. Nor is there any concern for loose parts. The separated end plate sections are still attached and will continue to function.

### Safety

The steam dryer assembly has no safety function. See BWR VIP-06A for additional discussion of steam dryer assembly safety. The flaw indications reported in the steam dryer INR's from RFO26 will not likely result in any lost parts at operating conditions. Therefore, there is no safety concern with continued operation with the Reference 1-10 indications left as is.

### Conclusions and Recommendations

The dryer unit end plates flaw assessment is based on the following factors: (1) it is a highly redundant structure and there is no structural consequence of the cracking and (2) postulated significant flaw extension leading to the flaw reaching the full section of the channel geometry would not create the opportunity for loose parts. Field experience supports this as-is operation decision in the context that the indications will be re-inspected at the next outage. It is recommended that the new visual indication given in Reference 2 be accepted as is. Repair is not recommended.

### References

1. GE INR-IVVI-VYR26-07-09 Rev. 1
2. GE INR-IVVI-VYR26-07-10 Rev. 1
3. GE INR-IVVI-VYR26-07-11
4. GE INR-IVVI-VYR26-07-12
5. GE INR-IVVI-VYR26-07-13
6. GE INR-IVVI-VYR26-07-14
7. GE INR-IVVI-VYR26-07-15
8. GE INR-IVVI-VYR26-07-16
9. GE INR-IVVI-VYR26-07-18
10. GE INR-IVVI-VYR26-07-19
11. GENE-0000-0047-2767