Joseph H. Plona
Site Vice President

6400 N. Dixie Highway, Newport, MI 48166
Tel: 734.586.5910 Fax: 734.586.4172

DTE Energy

10 CFR 50.55a

May 19, 2010
NRC-10-0037

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) Detroit Edison's Letter to NRC, "Submittal of the Inservice Testing Program Relief Requests for Pumps and Valves – Third Ten-year Interval," NRC-09-0064, dated November 3, 2009

Subject: Response to Request for Additional Information Regarding Relief Request VRR-012 for the Inservice Testing Program Third Ten-Year Interval

In Reference 2, Detroit Edison submitted proposed relief requests for the third ten-year interval of the Inservice Testing Program for Pumps and Valves. In an e-mail from Mr. Mahesh Chawla to Mr. Alan Hassoun dated March 3, 2010, the NRC requested additional information for Relief Request VRR-012, Relief to Perform Position Indication Testing at Appendix J Option B Frequency. This was discussed in a subsequent telephone conversation between NRC staff and Detroit Edison personnel on March 25, 2010. The additional information requested by the NRC staff is enclosed.

There are no new commitments included in this document.

Should you have any questions or require additional information, please contact Mr. Rodney W. Johnson of my staff at (734) 586-5076.

Sincerely,

Joseph H Plona

Enclosure

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

Enclosure to
NRC-10-0037

Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43

Response to Request for Additional Information (RAI) Regarding
Relief Request VRR-012, Relief to Perform Position Indication Testing at Appendix J
Option B Frequency for the Inservice Testing Program Third Ten-Year Interval

The following is Detroit Edison's response to each NRC request for additional information (RAI) for Relief Request VRR-012 (Relief to Perform Position Indication Testing at Appendix J Option B Frequency):

RAI #1.

The Fermi proposed request VRR-012 and justification is lacking specifics and does not shed much light on how the alternative testing will provide an acceptable level of quality and safety. It appears that the only benefit is the reduction in time/labor and ALARA savings. Please explain how much radiation dose would be saved should the alternative testing be approved to a 3 cycle interval.

Response:

Based on actual dose data from past testing, it is estimated that alternative testing performed at a 3-cycle interval would result in dose savings of about 600 mRem over three operating cycles.

RAI #2.

Fermi 2 request VRR-012 Attachment 1 details a typical solenoid valve arrangement that is representative of the 32 category A solenoid valves. After review of attachment 1, it is assumed that the stroke time acceptance band would be applicable to section ISTC-5152(c), valve strokes in less than 2 seconds. Please confirm the solenoid stroke time and explain how the stroke time data is tracked and trended for degradation. Please provide a sample of historical stroke time data for all 32 subject solenoid valves in support of your response. Also please include maintenance history and overall performance data, including position verification and seat leakage testing results, for all 32 subject solenoid valves in support of your response.

Response:

Relief Request VRR-012 Solenoid Operated Valve (SOV) stroke times (reference values and criteria) are shown in Table 1. When new stroke time data is entered into the IST database, there is an automated check for a deviation of more than 12% from the mean of the last 10 recorded values. This alerts the IST Engineer of the need to perform a more detailed analysis of the stroke time data. The 12% is a generic embedded feature of the software used for tracking and trending stroke times. See Table 2 for a sample of historical stroke time data. Table 3 provides a sample of Position Indication Test (PIT) history and Table 4 provides a sample of Local Leak Rate Testing (LLRT) history.

Note: Out of a total of 3119 stroke time tests recorded in the IST database for these 32 SOVs, there have been 23 failures. 15 of these failures were attributed to limit switch assembly adjustments. The remaining 8 failures were related to SOV sticking problems.

TABLE 1: SOV Close Stroke Time Testing Information

Valve Number	Size (inches)	Actuator	Required Action Criteria (seconds)	Reference value (seconds)
C5100F002A	3/8	SOV	> 2	0.570
C5100F002B	3/8	SOV	> 2	0.613
C5100F002C	3/8	SOV	> 2	0.477
C5100F002D	3/8	SOV	> 2	0.487
C5100F002E	3/8	SOV	> 2	0.417
E11F412	1	SOV	> 2	0.433
E11F413	1	SOV	> 2	0.367
E11F414	1	SOV	> 2	0.333
E11F415	1	SOV	> 2	0.300
E41F400	1	SOV	> 2	0.467
E41F401	1	SOV	> 2	0.583
E41F402	1	SOV	> 2	0.633
E41F403	1	SOV	> 2	0.433
P34F401A	3/4	SOV	> 2	0.533
P34F401B	3/4	SOV	> 2	0.467
P34F403A	3/4	SOV	> 2	0.433
P34F403B	3/4	SOV	> 2	0.367
P34F404A	3/4	SOV	> 2	0.450
P34F404B	3/4	SOV	> 2	0.320
P34F405A	3/4	SOV	> 2	0.330
P34F405B	3/4	SOV	> 2	0.307
P34F406A	3/4	SOV	> 2	0.293
P34F406B	3/4	SOV	> 2	0.357
P34F407	3/4	SOV	> 2	0.307
P34F408	3/4	SOV	> 2	0.320
P34F409	3/4	SOV	> 2	0.307
P34F410	3/4	SOV	> 2	0.403
T50F412A	1	SOV	> 2	0.700
T50F412B	1	SOV	> 2	0.600
T50F450	3/4	SOV	> 2	0.433
T50F451	3/4	SOV	> 2	0.333
T50F458	1	SOV	> 2	0.467

TABLE 2: SOV Close Stroke Time History Sample

Valve Number	Exam Date	Stroke Time
E41F400	05/30/2009	0.5
E41F401	05/30/2009	0.5
T50F412A	05/30/2009	0.8
E41F402	06/08/2009	0.5
E41F403	06/08/2009	0.4
T50F412B	06/08/2009	0.7
T50F458	06/08/2009	0.4
P34F401B	06/16/2009	0.25
E41F400	06/24/2009	0.5
E41F401	06/24/2009	0.59
T50F412A	06/24/2009	0.99
T50F412B	07/06/2009	0.9
P34F401B	07/20/2009	0.3
E41F400	07/30/2009	0.4
E41F401	07/30/2009	0.5
T50F412A	07/30/2009	0.8
T50F450	07/30/2009	0.5
T50F451	07/30/2009	0.4
C5100F002A	08/02/2009	0.4
C5100F002B	08/02/2009	0.5
C5100F002C	08/02/2009	0.6
C5100F002D	08/02/2009	0.3
C5100F002E	08/02/2009	0.5
T50F412B	08/10/2009	0.7
P34F401A	08/17/2009	0.5
P34F401B	08/17/2009	0.4
P34F403A	08/17/2009	0.3
P34F403B	08/17/2009	0.3
P34F404A	08/17/2009	0.4
P34F404B	08/17/2009	0.3
P34F405A	08/17/2009	0.4
P34F405B	08/17/2009	0.4
P34F406A	08/17/2009	0.3
P34F406B	08/17/2009	0.3
P34F407	08/17/2009	0.3
P34F408	08/17/2009	0.3
P34F409	08/17/2009	0.4
P34F410	08/17/2009	0.4
E41F400	08/27/2009	0.5
E41F401	08/27/2009	0.7
T50F412A	08/27/2009	0.8
E41F402	09/07/2009	0.3

Valve Number	Exam Date	Stroke Time
E41F403	09/07/2009	0.4
T50F412B	09/07/2009	0.4
T50F458	09/07/2009	0.4
P34F401B	09/14/2009	0.5
E41F400	09/23/2009	0.5
E41F401	09/23/2009	0.4
T50F412A	09/23/2009	0.9
T50F412B	10/05/2009	1.1
P34F401B	10/19/2009	0.3
E11F412	10/29/2009	0.4
E11F413	10/29/2009	0.3
E11F414	10/29/2009	0.4
E11F415	10/29/2009	0.4
E41F400	10/29/2009	0.4
E41F401	10/29/2009	0.5
T50F412A	10/29/2009	0.9
T50F450	10/29/2009	0.5
T50F451	10/29/2009	0.4
C5100F002A	10/31/2009	0.5
C5100F002B	10/31/2009	0.6
C5100F002C	10/31/2009	0.6
C5100F002D	10/31/2009	0.6
C5100F002E	10/31/2009	0.6
T50F412B	11/08/2009	1.2
P34F401A	11/16/2009	0.4
P34F401B	11/16/2009	0.4
P34F403A	11/16/2009	0.4
P34F403B	11/16/2009	0.4
P34F404A	11/16/2009	0.4
P34F404B	11/16/2009	0.4
P34F405A	11/16/2009	0.4
P34F405B	11/16/2009	0.4
P34F406A	11/16/2009	0.4
P34F406B	11/16/2009	0.4
P34F407	11/16/2009	0.4
P34F408	11/16/2009	0.4
P34F409	11/16/2009	0.4
P34F410	11/16/2009	0.3
E41F400	11/25/2009	0.3
E41F401	11/25/2009	0.3
T50F412A	11/25/2009	0.7
E41F402	12/07/2009	0.5

Valve Number	Exam Date	Stroke Time
E41F403	12/07/2009	0.4
T50F412B	12/07/2009	0.8
T50F458	12/07/2009	0.5
P34F401B	12/14/2009	0.4
E41F400	12/23/2009	0.4
E41F401	12/23/2009	0.4
T50F412A	12/23/2009	0.8
T50F412B	01/04/2010	0.5
P34F401B	01/18/2010	0.4
E41F400	01/27/2010	0.3
E41F401	01/27/2010	0.4
T50F412A	01/27/2010	0.8
T50F450	01/27/2010	0.5
T50F451	01/27/2010	0.4
C5100F002A	01/30/2010	0.6
C5100F002B	01/30/2010	0.5
C5100F002C	01/30/2010	0.5
C5100F002D	01/30/2010	0.4
C5100F002E	01/30/2010	0.5
T50F412B	02/08/2010	0.7
P34F401A	02/15/2010	0.7
P34F401B	02/15/2010	0.5
P34F403A	02/15/2010	0.5
P34F403B	02/15/2010	0.5
P34F404A	02/15/2010	0.5
P34F404B	02/15/2010	0.5
P34F405A	02/15/2010	0.5
P34F405B	02/15/2010	0.3
P34F406A	02/15/2010	0.6
P34F406B	02/15/2010	0.4
P34F407	02/15/2010	0.4
P34F408	02/15/2010	0.4
P34F409	02/15/2010	0.5
P34F410	02/15/2010	0.3
E41F400	02/25/2010	0.4
E41F401	02/25/2010	0.4
T50F412A	02/25/2010	0.7
E41F402	03/08/2010	0.5
E41F403	03/08/2010	0.4
T50F412B	03/08/2010	0.6
T50F458	03/08/2010	0.3
P34F401B	03/15/2010	0.4

TABLE 3: SOV Position Indication Test History Sample

Valve Number	Exam	Exam Date	Status	Test Freq	Procedure
E41F400	PIT	10/19/2007	PASS	2Y	43.401.379
E41F401	PIT	10/19/2007	PASS	2Y	43.401.401
T50F412A	PIT	10/19/2007	PASS	2Y	43.401.402
P34F401B	PIT	10/22/2007	PASS	2Y	43.401.346
P34F407	PIT	01/09/2008	PASS	2Y	43.401.405
P34F409	PIT	01/09/2008	PASS	2Y	43.401.405
T50F458	PIT	03/11/2008	PASS	2Y	43.401.389
P34F408	PIT	04/30/2008	PASS	2Y	43.401.383
T50F450	PIT	01/22/2009	PASS	2Y	43.401.354
T50F451	PIT	01/22/2009	PASS	2Y	43.401.383
P34F405A	PIT	03/04/2009	PASS	2Y	43.401.387
P34F405B	PIT	03/04/2009	PASS	2Y	43.401.386
P34F406A	PIT	03/04/2009	PASS	2Y	43.401.387
P34F406B	PIT	03/04/2009	PASS	2Y	43.401.386
E11F414	PIT	03/29/2009	FAIL	2Y	43.401.350
E11F415	PIT	03/29/2009	FAIL	2Y	43.401.351
T50F412A	PIT	04/02/2009	PASS	2Y	43.401.402
E11F414	PIT	04/04/2009	PASS	2Y	43.401.350
E11F415	PIT	04/04/2009	PASS	2Y	43.401.351
E41F401	PIT	04/04/2009	PASS	2Y	43.401.401
E41F400	PIT	04/06/2009	PASS	2Y	43.401.379
E11F412	PIT	04/09/2009	PASS	2Y	43.401.331
E11F413	PIT	04/09/2009	PASS	2Y	43.401.332
E41F402	PIT	04/09/2009	PASS	2Y	43.401.378
E41F403	PIT	04/09/2009	PASS	2Y	43.401.400
P34F401A	PIT	04/09/2009	PASS	2Y	43.401.329
P34F401B	PIT	04/09/2009	PASS	2Y	43.401.346
C5100F002A	PIT	04/11/2009	PASS	2Y	43.401.338
C5100F002B	PIT	04/11/2009	PASS	2Y	43.401.337
C5100F002C	PIT	04/11/2009	PASS	2Y	43.401.339
C5100F002D	PIT	04/11/2009	PASS	2Y	43.401.341
C5100F002E	PIT	04/11/2009	PASS	2Y	43.401.340
T50F412B	PIT	04/12/2009	PASS	2Y	43.401.403
P34F403A	PIT	06/30/2009	PASS	2Y	43.401.324
P34F404A	PIT	06/30/2009	PASS	2Y	43.401.324
P34F403B	PIT	07/16/2009	PASS	2Y	43.401.359
P34F404B	PIT	07/16/2009	PASS	2Y	43.401.359
P34F407	PIT	01/06/2010	PASS	2Y	43.401.405
P34F409	PIT	01/06/2010	PASS	2Y	43.401.405
P34F408	PIT	02/24/2010	PASS	2Y	43.401.383
P34F410	PIT	02/24/2010	PASS	2Y	43.401.383
T50F458	PIT	03/12/2010	PASS	2Y	43.401.389

TABLE 4: SOV LLRT History Sample

Valve Number	Measured Value	Status	Exam Date	Procedure Number	Valve Type	Corrective Action Document
C5100F002B	0.05	SAT	11/24/2004	43.401.337	Ball	
C5100F002C	0.05	SAT	11/24/2004	43.401.339	Ball	
C5100F002D	0.05	SAT	11/24/2004	43.401.341	Ball	
C5100F002E	0.05	SAT	11/24/2004	43.401.340	Ball	
C5100F002A	0.05	SAT	11/25/2004	43.401.338	Ball	
P34F408	0.2	SAT	01/31/2006	43.401.383	Globe	
P34F401B	0.34	RA	03/27/2006	43.401.346	Globe	06-21579 (accepted AF)
P34F401A	0.2	SAT	04/03/2006	43.401.329	Globe	
P34F401A	0.047	SAT	04/03/2006	43.401.329	Globe	
C5100F002A	0.047	SAT	04/05/2006	43.401.338	Ball	
C5100F002B	0.047	SAT	04/05/2006	43.401.337	Ball	
C5100F002C	0.047	SAT	04/05/2006	43.401.339	Ball	
C5100F002D	0.05	SAT	04/06/2006	43.401.341	Ball	
C5100F002E	0.05	SAT	04/06/2006	43.401.340	Ball	
T50F451	0.05	SAT	01/23/2007	43.401.383	Globe	
P34F403A	0.08	SAT	04/02/2007	43.401.324	Globe	
P34F404A	0.08	SAT	04/04/2007	43.401.324	Globe	
P34F403B	0.08	SAT	04/17/2007	43.401.359	Globe	
P34F404B	0.13	SAT	04/17/2007	43.401.359	Globe	
P34F405A	0.2	SAT	05/16/2007	43.401.387	Globe	
P34F405B	0.18	SAT	05/16/2007	43.401.386	Globe	
P34F406A	0.08	SAT	05/16/2007	43.401.387	Globe	
P34F406B	0.17	SAT	05/16/2007	43.401.386	Globe	
E11F412	0.05	SAT	10/02/2007	43.401.331	Globe	
E11F413	0.047	SAT	10/02/2007	43.401.332	Globe	
E41F402	0.2	SAT	10/10/2007	43.401.378	Globe	
E41F403	0	SAT	10/10/2007	43.401.400	Globe	
T50F412B	0	SAT	10/10/2007	43.401.403	Globe	
P34F401B	0.5	RA	10/13/2007	43.401.346	Globe	07-26139
P34F410	0.05	SAT	10/13/2007	43.401.383	Globe	
C5100F002A	0.05	SAT	10/16/2007	43.401.338	Ball	
C5100F002B	0.05	SAT	10/16/2007	43.401.337	Ball	
C5100F002C	0.05	SAT	10/16/2007	43.401.339	Ball	
C5100F002D	0.05	SAT	10/16/2007	43.401.341	Ball	
C5100F002E	0.05	SAT	10/16/2007	43.401.340	Ball	
E11F414	0.05	SAT	10/19/2007	43.401.350	Globe	
E11F415	0.11	SAT	10/19/2007	43.401.351	Globe	
E41F400	0.15	SAT	10/19/2007	43.401.379	Globe	
E41F401	0	SAT	10/19/2007	43.401.401	Globe	
T50F412A	0	SAT	10/19/2007	43.401.402	Globe	
P34F401B	0.05	SAT	10/22/2007	43.401.346	Globe	
P34F407	0	SAT	01/09/2008	43.401.405	Globe	

(continued)

TABLE 4: SOV LLRT History Sample (continued)

Valve Number	Measured Value	Status	Exam Date	Procedure Number	Valve Type	Corrective Action Document
P34F409	0	SAT	01/09/2008	43.401.405	Globe	
T50F458	0.05	SAT	03/11/2008	43.401.389	Globe	
P34F408	0.18	SAT	04/30/2008	43.401.383	Globe	
P34F401B	0.05	SAT	04/09/2009	43.401.346	Globe	
T50F451	0.05	SAT	02/24/2010	43.401.383	Globe	

Legend: SAT is Satisfactory
RA is Required Action
AF is As Found

RAI #3.

It was stated that the 32 category A solenoid valves are subject to the Preventive Maintenance (PM) program. Please explain what preventive measures are performed on the 32 category A solenoid valves. Please include in your explanation the PM task intervals and a sample of historical PM tasks completed for the 32 category A solenoid valves.

Response:

The response for this RAI is provided in the response to RAI #4.

RAI #4.

It was stated that some of the 32 category A solenoid valves were part of the EQ program and that they were on a periodic replacement interval. Please identify which valves are EQ, their replacement interval and when they were last replaced.

Response:

Table 5 provides information on the SOVs classified as Environmental Qualification (EQ) Category 2B including required replacement, frequency and previous completion dates. Eight of the 32 total SOVs in Relief Request VRR-012 are classified EQ Category 2C. All 32 SOVs are included and classified in the PM Program; however, PM Events are currently only specified for Category 2B SOVs.

TABLE 5: SOV EQ PROGRAM REQUIRED MAINTENANCE

Valve Number	PM	Description	EQ	Frequency (days)	Previous Completion Date
E11F412	E156	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/16/2003
E11F412	Q011	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/16/2003
E11F413	E157	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/22/2003
E11F413	E011	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/22/2003
E11F414	E158	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/05/2003
E11F414	E088	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/05/2003
E11F415	E159	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/05/2003
E11F415	E090	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/05/2003
E41F400	E436	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/11/2003
E41F400	E093	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/11/2003
E41F402	E437	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/08/2003
E41F402	E099	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/08/2003
P34F401A	H185	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/21/2006
P34F401A	E160	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	10/12/1998
P34F401B	P237	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/21/2006
P34F401B	E161	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	10/12/1998

(continued)

TABLE 5: SOV EQ PROGRAM REQUIRED MAINTENANCE (continued)

Valve Number	PM	Description	EQ	Frequency (days)	Previous Completion Date
P34F403A	H189	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	02/11/2005
P34F403A	H176	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	02/11/2005
P34F403B	H190	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	11/16/2004
P34F403B	H184	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	11/16/2004
P34F404A	H191	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	02/11/2005
P34F404A	E191	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	02/11/2005
P34F404B	H200	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	01/31/2005
P34F404B	E192	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	01/31/2005
P34F405A	H201	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/08/2005
P34F405A	E194	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/08/2005
P34F405B	H202	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	05/27/2005
P34F405B	E195	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	05/27/2005
P34F406A	H203	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/08/2005
P34F406A	H193	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/08/2005
P34F406B	H204	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	05/27/2005
P34F406B	H196	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	05/27/2005
P34F407	H205	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/15/2005
P34F407	H197	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/15/2005
P34F408	P284	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	05/05/2005
P34F408	H198	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	05/05/2005

(continued)

TABLE 5: SOV EQ PROGRAM REQUIRED MAINTENANCE (continued)

Valve Number	PM	Description	EQ	Frequency (days)	Previous Completion Date
P34F409	H207	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/15/2005
P34F409	E199	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/15/2005
P34F410	H208	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	05/05/2005
P34F410	E202	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	05/05/2005
T50F412A	T608	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	04/09/2003
T50F412A	E208	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	04/09/2003
T50F412B	T610	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,300	11/20/2004
T50F412B	E217	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	7,150	11/20/2004
T50F450	U367	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/28/2005
T50F450	U360	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/28/2005
T50F451	U368	REPLACE 10 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	3,458	04/28/2005
T50F451	U362	REPLACE 20 YEAR COMPONENTS REQUIRED BY NE-6.6-EQMS.070.	Y	6,916	04/28/2005

NOTE: Valves C5100F002A through E, E41F401, E41F403 and T50F458 are EQ Cat 2C, no periodic EQ parts replacements are specified.