

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Tuesday, February 28, 2017 4:37 PM  
**To:** Willis, Frederick H.; Nick Kellenberger (nicholas.r.kellenberger@scana.com)  
**Cc:** Patel, Chandu; Gleaves, Bill; Woods, David F.; THOMPSON, RYDER CLARK; Welch, Christopher  
**Subject:** ICN and UIN Discussion Items for March 2, 2017 Public Meeting  
**Attachments:** Summary of VOGTLE AND SUMMER ICN and UIN ISSUES Feb 28 2017.docx; 2017-03-02 ICN UIN status update.pdf

Hi Fred and Nick –

Can SNC and SCANA support a discussion on ITAAC Closure Notifications (ICNs) and Uncompleted ITAAC Notifications (UINs) at this week's public meeting, on **March 2<sup>nd</sup>, 2017**.

Please see the attached documents detailing the ICN and UIN discussion items.

Please let me know if you have any questions or concerns.

Thank you,

Jordan Hoellman  
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**From:** Hoellman, Jordan

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MESSAGE	601	2/28/2017 4:36:54 PM
Summary of VOGTLE AND SUMMER ICN and UIN ISSUES Feb 28 2017.docx		
25282		
2017-03-02 ICN UIN status update.pdf	63918	

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**VOGTLE AND SUMMER  
ICN / UIN  
ISSUES TRACKING SHEET**

<b>Date</b>	<b>No.</b>	<b>ICN UIN</b>	<b>TOPIC</b>	<b>ITAAC INDEX NUMBERS RECEIVED</b>	<b>ISSUE</b>
2/28/17	1	UIN	RV Head baseline Insp.	V3 89	UIN does not provide ASME Code year and addenda and article / sub article or description of activities supporting the Code case N-729-1. Does not provide sufficient info for acceptance criteria for an ICN.

<b>Date</b>	<b>No.</b>	<b>ICN UIN</b>	<b>TOPIC</b>	<b>ITAAC INDEX NUMBERS RECEIVED</b>	<b>ISSUE</b>
2/28/17	2	UIN	DAS Manual actions reference ITAAC	V3 520	THE UIN does not provide any indication how the manual actions were verified nor does the ITAAC referenced. IDB needs to describe how this requirement was met by the reference ITAAC.

<b>Date</b>	<b>No.</b>	<b>ICN UIN</b>	<b>TOPIC</b>	<b>ITAAC INDEX NUMBERS RECEIVED</b>	<b>ISSUE</b>
2/28/17	3	UIN	Containment electrical penetrations	V3 109	The UIN does not adequately describe which method of protection was utilized

<b>Date</b>	<b>No.</b>	<b>ICN UIN</b>	<b>TOPIC</b>	<b>ITAAC INDEX NUMBERS RECEIVED</b>	<b>ISSUE</b>
2/28/17	4	ICN	RV and components Hydro	V3 74 V4 74	This hydro is the as-built installed system hydro similar to the other ASME ICN submittals

<b>Date</b>	<b>No.</b>	<b>ICN UIN</b>	<b>TOPIC</b>	<b>ITAAC INDEX NUMBERS RECEIVED</b>	<b>ISSUE</b>
2/28/17	5	ICN	Located on NI	V4 684	The component has not been installed ICN is submitted incorrectly based on drawing reviews.

Date	No.	ICN UIN	TOPIC	ITAAC INDEX NUMBERS RECEIVED	ISSUE
2/28/17	6	UIN	Functional Arrangement	V3 1	The UIN needs to tie in the definition of functional arrangement regarding being arranged in a manner capable of performing the required function.

Date	No.	ICN UIN	TOPIC	ITAAC INDEX NUMBERS RECEIVED	ISSUE
11/4  Update 1/3	7	UIN	Thermocouple sheath	570	<p>NRC Comment: UIN should include quality aspect of inspection results of sheathing (no cracking etc.)</p> <p>SNC does not intend to withdraw or modify the UIN. Tier 2 chapter 4 section 4.4.6.1 does not support comment as being required to complete ITAAC. UIN refers to appropriate quality inspection procedure to verify presence of sheaths.</p> <p>Staff does not agree with response. This ITAAC is similar to ITAAC that use the phrase something exists. Tier 1 states when this language is used it means the item is present and capable of performing its function as described I the design description.</p>

**ISSUES TRACKING SHEET**

Date	No.	ICN OR UIN	TOPIC	ITAAC INDEX No. RECEIVED	ISSUE
1/3	8	UIN	AS-built IDS fault currents vs MFGR equipment ratings	Vogtle 3 617, 618,	<p>This item was discussed during public calls on 12/15/16 and 1/12/17. This write-up was revised following the Jan. 12 call. This section refers to NEI 08-01, Rev 5 Corrected</p> <p>NEI 08-01 Demo 5 was written for ITAAC index No. 617. ITAAC index Nos. 618 and 619 are very similar and Demo 5 would be an appropriate example for these UINs. However, based on the IDB provided in the UINs for ITAAC 617 and 618 Demo 5 is not consistent with the IDB provided in the UINs and may be incorrect.</p> <p>The UINs for 617 &amp; 618 are not consistent with NEI 08-01 Section 6, which requires that UIN/ICNs describe / explain the methodology and key steps used in performing the ITA and determining that each element of the AC was met. Required information includes, but is not limited to, a description of the specific procedures and analytical methods used for performing the ITA and determining the prescribed AC are met. If the IDB references non-public documents, it should include a brief summary of the salient information included in those documents.</p> <p>Review of ITAAC 617 &amp; 618 and the two UINs identify the key steps include: analysis to calculate the maximum IDS fault currents, analysis to determine the breaker/fuse minimum required interrupt capacity and analysis to complete the IDS protection coordination study (which appears to be critical in each of these ITAAC). The submitted UINs do not describe / explain the methodology and key steps to perform the short circuit (i.e. fault) analyses or circuit interrupting device coordination analyses, nor do they provide adequate reference to the appropriate IEEE standard and section(s). UIN 618 refers to the short circuit analysis document while 617 does not. Reference to section 7.1 of IEEE-946-1992 is incomplete, providing only a portion of the necessary information.</p> <p>Pursuant to UFSAR section 8.3.2.2, short circuit analyses are performed per IEEE 964 and circuit interrupting device coordination analyses are performed per IEEE 141 and 142 (or other applicable industry standards or practices). While referencing the UFSAR (UIN 618) may be acceptable for the UIN it would not be acceptable for the ICN because the method used is not specifically defined in section 8.3.2.2.</p> <p>The IDB for Demo 5 verifies the AC is met by comparing the nameplate ratings for the circuit breakers and fuses to the analytically determined fault currents (i.e. short circuit analysis). In the UIN it compares the nameplate ratings to the analyses documented in the IDS protection coordination study.</p> <p>All three ICNs/UINs for ITAAC 617, 618, and 619 should be written in the same format with the description for the required analyses being identical in each ICN/UIN with the appropriate references.</p>

Date	No.	ICN OR UIN	TOPIC	ITAAC INDEX No.	ISSUE
1/3	9	ICN	HFE HIS task support verification	Vogtle 3 Vogtle 4 Summer 2 Summer 3  739,739, 739,739	<p>This item was discussed during public calls on 12/15/16 and 1/12/17. This write-up was revised following the Jan. 12 call. This section refers to NEI 08-01, Rev 5 Corrected</p> <p>NEI 08-01 Example D52 is for ITAAC index No. 741. The ICN for ITAAC 741 was accepted. D52 is an appropriate example for use with ITAAC index No. 739. However, Example D52 contains greater detail in the IDB than was provided in the ICNs for ITAAC 739.</p> <p>The four ICNs for ITAAC index No. 739 are not consistent with NEI 08-01 Section 6, which requires that ICNs describe / explain the methodology and key steps used in performing the ITA and determining that each element of the AC was met. Required information includes, but is not limited to, a description of the specific procedures and analytical methods used for performing the ITA and determining the prescribed AC are met. If the IDB references non-public documents, it should include a brief summary of the salient information included in those documents.</p> <p>Specifically, the first paragraph of D52 provided information which expanded upon what was evaluated “(including operating procedures, operator performance, and control room design)” ----- and the specific results “participants received appropriate training, simulator scenarios contained appropriate detail and were executed in conformance with the plan, the near-full scope simulator provided an appropriate test bed, test data was collected and analyzed in accordance with the plan and deficiencies were appropriately documented and prioritized.”</p> <p>The second paragraph of D52 stated, “The ISV results demonstrate, via the successful management of complex operational and accident scenarios, that the main control room design (MCR), Human-system Interface resources, procedures, MCR staffing, and operator training are adequate to support safe operation.”</p> <p>Discussed 2/16/17 licensee agreed to add additional references to public version of proprietary documents and evaluate possibility of providing further information to IDB.</p>

Date	No.	ICN OR UIN	TOPIC	ITAAC INDEX NUMBERS RECEIVED	ISSUE
1/3	10	UIN	HFE MCR HSI. Resources available	Vogtle 3 751	<p>This item was discussed during public calls on 12/15/16 and 1/12/17. This write-up was revised following the Jan. 12 call. This section refers to NEI 08-01, Rev 5 Corrected</p> <p>NEI 08-01 Example D52 is not an appropriate example for use with ITAAC index No. 751. D52 is an evaluation of the implementation of a portion of the HFE V&amp;V program. ITAAC 751 is for an inspection of the HSi resources available to MCR operators in the MCR.</p> <p>The UIN for ITAAC index No. 751 is not consistent with NEI 08-01 Section 6, which requires that UINs/ICNs describe / explain the methodology and key steps used in performing the ITA and determining that each element of the AC was met. Required information includes, but is not limited to, a description of the specific procedures and analytical methods used for performing the ITA and determining the prescribed AC are met. If the IDB references non-public documents, it should include a brief summary of the salient information included in those documents.</p> <p>For this UIN, an inspection of the HSI resources is performed to confirm that the HSI resources available in the MCR for the MCR operators at the time of plant startup include an alarm system, plant information system (nonsafety-related displays), wall panel information system, nonsafety-related controls (soft and dedicated), and computerized procedure system. The UIN does not state the purpose of the inspection or what was done to perform it. It merely refers to verification of the inclusion of HSI systems and controls in the MCR without ever stating how that was done or what that exactly means. The UIN also refers to results without stating what those results are and what is contained in them.</p> <p>Discussed 2/16/17 licensee agreed to add additional references to public version of proprietary documents and evaluate possibility of providing further information to IDB.</p>

Date	No.	ICN OR UIN	TOPIC	ITAAC INDEX NUMBERS RECEIVED	ISSUE
1/9	11	ICN	HFE HSI Design Verification	Vogtle 3 & 4 740, 740	<p>This item was discussed during public calls on 12/15/16 and 1/12/17. This write-up was revised following the Jan. 12 call. This section refers to NEI 08-01, Rev 5 Corrected</p> <p>NEI 08-01 Example D52 is for ITAAC index No. 741. The ICN for ITAAC 741 was accepted. D52 is an appropriate example for use with ITAAC index No. 740. However, Example D52 contains greater detail in the IDB than was provided in the UIN for ITAAC 740.</p> <p>The UIN for ITAAC index No. 740 is not consistent with NEI 08-01 Section 6, which requires that UINs/ICNs describe / explain the methodology and key steps used in performing the ITA and determining that each element of the AC was met. Required information includes, but is not limited to, a description of the specific procedures and analytical methods used for performing the ITA and determining the prescribed AC are met. If the IDB references non-public documents, it should include a brief summary of the salient information included in those documents.</p> <p>Discussed 2/16/17 licensee agreed to add additional references to public version of proprietary documents and evaluate possibility of providing further information to IDB.</p>



ICNs

VOICES STATUS

4570	204	V3	acc cmt ck viv	Awaiting resubmittal	Insufficient information	Resubmittal Required
4684	204	V4	acc cmt ck viv	Awaiting resubmittal	Insufficient information	Resubmittal Required
6148	435	V3	ASME HYD C	Withdrawn	Insufficient information	Resubmittal Required
4876	435	V4	ASME HYD C	Withdrawn	Insufficient information	Resubmittal Required
3817	124	V3	ASME HYD C	Withdrawn	Insufficient information	Resubmittal Required
4395	74	V3	RV & COMP HYD	Not discussed yet	Insufficient information	Resubmittal Required
4530	74	V4	RV & COMP HYD	Not discussed yet	Insufficient information	Resubmittal Required
4104	431	V3	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4873	431	V4	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4305	678	V3	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
5086	678	V4	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4070	392	V3	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4834	392	V4	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4588	120	V4	ASME D&C C	Disagree not going to resubmit	Insufficient information	Resubmittal Required
4361	739	V3	HFE	Disagree not going to resubmit	Under Disposition	Licensee to respond
5147	739	V4	HFE	Disagree not going to resubmit	Under Disposition	Licensee to respond
5957	739	S2	HFE	Disagree not going to resubmit	Under Disposition	Licensee to respond
6766	739	S3	HFE	Disagree not going to resubmit	Under Disposition	Licensee to respond
4366	740	V3	HFE V&V	Disagree not going to resubmit	Under Disposition	Licensee to respond
5146	740	V4	HFE V&V	Disagree not going to resubmit	Under Disposition	Licensee to respond
4179	514	V3	DAS EMI Surge RFI	Awaiting resubmittal	Insufficient information	Resubmittal Required
4995	514	V4	DAS EMI Surge RFI	Awaiting resubmittal	Insufficient information	Resubmittal Required

VOICES STATUS

5059	630	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4283	630	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
3976	291	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4742	291	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4839	386	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4074	396	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4041	361	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4903	462	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4311	684	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
5091	684	V4	Seismic Loc NI	Not discussed yet	Insufficient information	Resubmittal Required
6124	437	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4878	437	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4130	462	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
3711	6	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
6966	6	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
3714	9	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4471	9	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
5218	823	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4447	823	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
5014	579	V4	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4237	579	V3	Seismic Loc NI	SNC evaluating	Insufficient information	Resubmittal Required
4454	831	V3	ETRM exits	SNC evaluating	Insufficient information	Resubmittal Required
5228	831	V4	ETRM exits	SNC evaluating	Insufficient information	Resubmittal Required
4455	832	V4	Rad Mon exist	SNC evaluating	Insufficient information	Resubmittal Required
	832	V3	Rad MON Exists	SNC evaluating	Insufficient information	Resubmittal Required

UINS

VOICES STATUS

626	570	V3	TC sheath	Disagree not going to resubmit	UIN Review	Need NRC Final action	Resubmittal Required
744	707	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
508	449	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
475	414	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
414	384	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
451	391	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
516	456	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
518	458	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
129	68	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
311	252	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
615	556	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
280	219	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
552	482	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
562	503	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
490	430	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
557	486	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
537	477	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
343	284	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
152	90	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
632	564	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
628	573	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
540	481	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
645	592	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
649	596	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
676	621	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
749	712	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
548	488	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
737	701	V3	FA	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
399	339	V3	FA MHS	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
62	1	V3	FA FHS	Not discussed yet	Review Suspended	Resubmittal Required	Resubmittal Required
675	618	V3	El eq cap	Disagree not going to resubmit	UIN Review	Need NRC Final action	Need NRC Final action
670	617	V3	El eq rating	Disagree not going to resubmit	UIN Review	Need NRC Final action	Need NRC Final action
671	616	V3	El eq cap	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
828	781	V3	el sep	Awaiting resubmittal	Review Suspended	Resubmittal Required	Resubmittal Required
791	751	V3	hfe	Disagree not going to resubmit	UIN Review	Licensee to respond	Licensee to respond

VOICES STATUS

150	89	V3	RV inspection	Not discussed yet	UIN Review	Resubmittal Required
425	365	V3	libb	Awaiting resubmittal	Review Suspended	Resubmittal Required
84	23	V3	libb	Awaiting resubmittal	Review Suspended	Resubmittal Required
291	230	V3	libb	Awaiting resubmittal	Review Suspended	Resubmittal Required
317	258	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
458	395	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
350	290	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
286	225	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
496	436	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
181	125	V3	ASME HYD ppg	Disagree not going to r	Review Suspended	Resubmittal Required
315	254	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
415	356	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
345	286	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
455	393	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
282	221	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
492	432	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
75	14	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
153	92	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
183	121	V3	ASME DC ppg	Disagree not going to r	Review Suspended	Resubmittal Required
314	256	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
347	288	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
417	358	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
457	394	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
284	223	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
494	434	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
79	16	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
185	123	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required
155	94	V3	ASME NDE ppg	Disagree not going to r	Review Suspended	Resubmittal Required