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December 31, 1995

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Subject: River Bend Station - Unit 1  
Docket No. 50-458  
License No. NPF-47  
Request for Exercise of Enforcement Discretion

File Nos.: G9.5, G9.42

RBG-42325  
RBF1-95-0327

Gentlemen:

At 0702 on December 28, 1995 Entergy Operations, Inc. (EOI) entered Technical Specification (TS) 3.8.1, "AC Sources - Operating," Action Statement B, in order to perform maintenance on the Division II Emergency Diesel Generator (EDG). The purpose of this evolution was to collect diagnostic information and heat the engine for a hot crankshaft alignment check in accordance with the manufacturer's recommendations for this class of standby service. While the EDG was out of service, water was discovered in the lube oil. Subsequent inspection of the EDG internals concluded that the source of the leak was at the lube oil cooler tube sheet packing gland. In addition, scuffing of the Number 4 piston was identified. No other component deficiencies were identified, and the proposed corrective actions are expected to return the Division II EDG to service.

Due to required repairs, the EDG will not be available for service prior to expiration of the 72-hour Limiting Condition for Operation (LCO) specified in TS 3.8.1 Action B. In accordance with this LCO, failure to comply with Action B requires that the plant be shutdown to Mode 3 within 12 hours and Mode 4 within 36 hours. As discussed with members of your staff on December 31, 1995, EOI requests that the NRC exercise enforcement discretion as discussed in NUREG-1600, "General Statement of Policy and Procedures for NRC Enforcement Actions," and in Administrative Letter 95-05, "Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion," to allow for completion of the appropriate repairs while the

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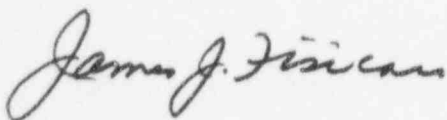
plant remains on line. These repairs are discussed in the attachment and are scheduled to be completed by 0700, January 2, 1996. Granting the proposed enforcement discretion will allow River Bend Station to avert an unnecessary plant shutdown as discussed in NRC Administrative Letter 95-05, Section B.1 for undesirable transients.

As discussed, this enforcement discretion will expire at 0702 on January 3, 1996, or if the plant should trip prior to this expiration date. EOI also agrees that if further investigation reveals damage to the Diesel Generator that cannot be repaired in the Allowed Out-of-Service Time, then the plant will be required to be shut down. In addition, since APRM flow bias testing will be performed on January 1, 1996, special precautionary measures will be taken. These measures include treating the maintenance as a High Risk activity (This requires direct supervisory involvement during the testing.) and using technicians who have recently performed the testing.

This request has been reviewed and approved by the River Bend Station Facility Review Committee. The attachment provides the information supporting the request as required by the NRC Inspection Manual (Part 9900 - Technical Guidance), "Operations - Notices of Enforcement Discretion." The information contained in the attachment to this document supports that the health and safety of the public will be protected with this enforcement discretion.

If you have further questions regarding this matter or require additional information, please contact Mr. T. W. Gates at 504-381-4866.

Sincerely,



JJF\TWG\jr  
enclosure

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Attn: Administrator

1. *The TS or other license conditions that will be violated.*

Entergy Operations Inc (EOI) has identified a condition which warrants consideration of discretionary enforcement. During planned maintenance activities, it was discovered that a Division II Emergency Diesel Generator (EDG) lube oil cooler tube sheet packing gland had failed, resulting in the migration of water into the diesel engine lube oil. During the investigation, it was discovered that the Number 4 piston had been scuffed. Corrective actions include repairing the lube oil cooler gasket and inspecting the Number 4 piston.

Based on the current schedule for repair of the lube oil cooler and placement of the EDG into service, the requirements of Technical Specification (TS) 3.8.1, Action B, will not be met. This Action requires that the EDG be returned to operable status within 72 hours, or enter TS 3.8.1 Action F which requires the plant to be in hot shutdown within 12 hours (Mode 3) and cold shutdown (Mode 4) within 36 hours. TS Action B will expire at 0702 on December 31, 1995; therefore, EOI proposes that enforcement discretion be exercised to extend the current allowed outage time by 72 hours.

2. *The circumstances surrounding the situation, including root causes, the need for prompt action and identification of any relevant historical events.*

At 0702 on December 28, 1995, the Division II EDG was declared inoperable for the purpose of performing certain maintenance. This included instrument recalibration and crankshaft alignment measurements (hot web deflection). On the morning of December 30th, the Division II EDG operated satisfactorily for approximately 30 minutes loaded and was then secured. In the afternoon of December 30th, the diesel was started to confirm operability of the unit. After approximately 12 minutes of satisfactory operation of the acceptance test, unusual sounds were noted in the diesel room and the decision was made to terminate the test. Subsequent investigation indicates that there was water in the lube oil from a leaking tube sheet packing gland on the associated lube oil cooler. This condition may have resulted in some scuffing on the piston skirts.

Additional time beyond the 72 hours allowed by Action B of Technical Specification 3.8.1 is required to perform the necessary repairs.

A small amount of water in-leakage from the jacket water cooling system to the lube oil system was known to exist. On November 10, 1994, an oil sample collected from the Division II EDG indicated the presence of water in the lube oil. Later samples confirmed the initial finding. Analysis of the samples indicated that the water in the oil

was from the jacket water cooling system. In the worst case, the oil sample was 2% water by volume. However, it should be noted that the sample was conservative of the overall lube oil system because the sample was drawn from a low point drain where water is intended to collect by design.

A periodic oil sampling program was initiated which confirmed a source of water from the jacket water cooling system to the lube oil system. The in-leakage was small and found to occur only for a short period of time immediately following unit shutdown (system design pressures prevent water in-leakage to the lube oil system while the diesel is running). This small leak did not affect the functional reliability of the diesel generator and that operation until the next refueling outage was acceptable, provided that periodic sampling and monitoring was performed until the leak was repaired. Monitoring of the water in the oil system since this condition was discovered showed the in-leakage rate had remained small and steady with no apparent degradation.

The condition discovered in this event appears to be a step change in the amount of leakage previously identified.

3. *The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action. This evaluation should include at least a qualitative risk assessment derived from the licensee's PRA.*

A qualitative risk assessment has been performed to evaluate the safety significance of this one-time deviation from the River Bend TS. Based on the safety evaluation discussed below, allowing an additional 72 hours to restore the Division II EDG to service does not cause a significant increase in core damage risk. This evaluation assumes that Division I equipment important for a safe shutdown and off-site power circuits remain operable for the duration of the Division II EDG outage. Compensatory actions that serve to support these assumptions are described in item Number 6 below.

The Division II EDG provides a backup power source for Division II safety-related components in the event of a loss of off-site power. No work is ongoing which could affect the likelihood of a loss of site power. The loss of off-site power initiator accounts for approximately 20 percent of the overall baseline core damage frequency for River Bend Station. As such, Station Blackout scenarios are not the dominant risk contributor for the River Bend design. The diesel generators are a moderate contributor to core damage frequency with a Risk Achievement Worth of approximately 4.0. For perspective, the diesel generators are less important than other support systems such as standby service water but are more important than individual ECCS trains. Two key factors influence the importance of the diesel generators.

These are the likelihood of a loss of offsite power event and the ability to restore off-site power if it is lost. If a loss of off-site power is caused by severe weather, it generally takes longer to restore off-site power (NSAC-166). Therefore, weather conditions have been considered in assessing the safety basis for this request. Based on the expected weather conditions, the likelihood of a LOSEP is average (no increase or decrease).

Existing plants conditions were also taken into consideration for this evaluation. The Division I Containment Monitoring System Valve CMS\*V40 is out of service. As a result, the Division I Drywell Hydrogen Analyzer is inoperable. Other activities in the plant are being administratively limited to Division II equipment. Any activities that could potentially affect Division I safety-related equipment are being strictly prohibited.

The assumed unavailability of the Division I Containment Monitoring System Valve CMS\*V40 has no impact on the Large Early Release Fraction (LERF). A qualitative analysis of the containment failure frequency was done. The Hydrogen analyzers are not credited in the River Bend Level 2 PSA. While the containment monitoring system would be unavailable if off-site power is lost, this preexisting condition should not affect the ability to mitigate an accident scenario which threatens containment integrity. While the LERF is indirectly impacted by the slight change to the Core Damage Frequency (CDF) as assessed below, there is no direct impact on the LERF for this condition.

RBS is currently in power coastdown prior to a refueling outage scheduled to start January 6, 1996. The current core capability is less than 85% power. Therefore, the core stored energy and core decay heat are less than the design basis values; thus, the capability of mitigating systems (e.g., ECCS, cooling water systems) required to respond to a transient is increased. Additionally, under anticipated conditions during the period covered by this enforcement discretion, an RBS plant shutdown would be the largest contributor to the potential for grid instability.

For the current plant configuration (the Division II diesel generator being unavailable) and the current weather conditions, the calculated CDF for River Bend is  $1.52E-5/\text{yr}$ . This is an increase of  $1.16E-5/\text{yr}$  compared to a baseline CDF of  $3.55E-6/\text{yr}$ . Note however, that this relative core damage probability would change based on other equipment being taken in and out of service. This temporary risk increase assumes that no work is scheduled that could cause a grid instability and that no work is scheduled that would cause Division I equipment important to safety to be out of service.

Extending the allowed outage time for an additional 72 hours as requested has been evaluated against the temporary risk increase guidelines as defined in the NEI PSA Applications Guide (EPRI TR-105396). The PSA Applications Guide defines a temporary risk increase as follows:

“Temporary risk increases involve applications such as one-time technical specification exemptions, justifications for continued operations (JCOs), and event significance assessments.” (pages 4-7)

The PSA Applications guide also defines temporary risk increases to be non-risk significant if it results in the core damage probability of less than  $1 \times 10^{-6}$  and the large, early release probability of less than  $1 \times 10^{-7}$ . (See Figure 4-3, pages 4-9)

Assuming that a technical specifications extension of 72 hours is granted and no additional systems are lost that could impact the core damage frequency, the core damage probability is calculated to be:

$$\text{CDP} = 1.16\text{E-}5/\text{yr} * 6 \text{ days (3d LCO + 3d extension)}/ 365 \text{ d/yr. or } 1.9\text{E-}7.$$

This calculated value is well below the PSA Applications Guide CDP of  $1 \times 10^{-6}$  for a temporary risk increase to be considered as non-risk significant. Therefore a clear safety basis exists for granting this one-time limited extension to the Division II EDG allowed outage time. These factors combined with the economic hardship caused by a plant shutdown and the insignificant risk involved support this RBS request for enforcement discretion.

4. *The basis for the licensee's conclusion that the noncompliance will not be of potential detriment to the public health and safety and that neither an unreviewed safety question nor a significant hazard consideration is involved.*

A “significant hazards consideration” is not involved if operation of the facility with the noncompliance does not (1) involve a significant increase in the probability or consequences of any accident previously evaluated, (2) create the possibility of a new or different kind of accident from previously evaluated, or (3) involve a significant reduction in a margin of safety. This request is evaluated against each of these criteria as follows:

Criterion 1: Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The standby Diesel Generators are backup alternating current power sources designed to power essential safety systems in the event of a loss of offsite power. Diesel Generators are not an accident initiator in any accident previously evaluated. Therefore, the Enforcement Discretion for the Division II Standby Diesel Generator does not involve any increase to the probability of any accident previously evaluated.

The Standby Diesel Generators provide backup power to components that mitigate the consequences of accidents. The Enforcement Discretion for the Division II Standby Diesel Generator allowed outage time (AOT) does not affect any of the assumptions used in deterministic safety analyses.

To fully evaluate the AOT Enforcement Discretion, probabilistic safety analysis methods were used. In evaluating the associated plant risk (using core damage probability as a figure of merit), the quantitative results indicate that the increase in risk is acceptable and is non-risk significant when reviewed against the guidance of the NEI PSA Applications Guide. (This is discussed under Question 3, above.) The calculated core damage probability increase is approximately  $1.9E-7$ , which is well below the  $1E-6$  criteria for non-risk significant temporary plant changes such as Enforcement Discretion actions. Qualitative assessment indicates that risk of plant operation under the Enforcement Discretion would be reduced due to the following factors:

- Compensatory measures to be instituted by Operations (described under Question 6, below) which will protect the reliability and operability of Division I safety equipment during the time the Enforcement Discretion is in effect.
- River Bend is currently in power coastdown prior to a Refueling outage scheduled to start 1/6/96. Maximum reactor power is approximately 85%. Thus, core decay heat levels and stored energy are less than under full power design basis conditions, resulting in increased margins in the capability of plant equipment (e.g., ECCS systems, cooling water systems) for responding to any postulated transient.
- The extreme outside air temperatures predicted for the period of the Enforcement Discretion range between above  $30^{\circ}\text{F}$  to approximately  $70^{\circ}\text{F}$ . These temperatures are mild and result in increased capability and lower temperatures for plant cooling systems compared to the conditions of a Louisiana summer. The lower ambient and cooling



system temperatures will also result in increased capability margins for plant equipment.

Further, there is some risk associated with performing a plant shutdown vice remaining at power while the Division II Standby Diesel Generator repairs are completed. Under current conditions, the load swings due to a River Bend plant shutdown would be the largest expected contributor to any grid instabilities which in turn could result in a loss of offsite power. The Enforcement Discretion action would eliminate that risk.

It is thus concluded that there is no significant increase in the probability or consequences of an accident under the Enforcement Discretion action.

Criterion 2. Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The Enforcement Discretion does not alter the design, configuration, or method of operation of the plant. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3: Does Not Involve a Significant Reduction in the Margin of Safety.

The Enforcement Discretion does not affect the technical specification limiting conditions for operation or their bases, which support the deterministic analyses used to establish the margin of safety. Quantitative PSA analyses indicate that the increase in risk is acceptable and is non-risk significant per the NEI PSA Applications Guide. Qualitative consideration of mitigating factors indicates that the non-quantifiable factors such as plant compensatory actions, lower plant power level during coastdown, and mild outside temperature conditions all would lower the risk to the public health and safety. Further, a plant shutdown would increase the probability of grid transients which have the potential to cause a Loss of Offsite power. The Enforcement Discretion action would eliminate that risk. Thus, the requested action does not involve a significant reduction in the margin of safety.

The risk associated with the extension of the allowed outage time is well within the standards for acceptable risk as defined in the NEI PSA Applications Guides referenced in item 3 above. Reasonable compensatory actions are being taken by EOI to facilitate the protection of the public. These actions ensure that the public will not be exposed to any undue risk. Both internal and external factors which could

potentially affect the plant's condition and its continued safe operation have been investigated. External factors such as the expected weather conditions and grid stability have been considered and these do not pose any increased risk. Internal to the plant, actions to protect the reliability and availability of the Division I safety components have been implemented. The Division I diesel has exhibited a high reliability. These plant conditions provide a high confidence that if a loss of offsite power were to occur, the health and safety of the public would continue to be protected.

5. *The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment.*

No release of effluents occurred or are expected as a result of the lube oil cooler tube sheet packing gland failure. In addition, no decrease in monitoring capabilities will occur as a result of the Division II EDG being out of service. In conclusion, there is no increase in the types or quantity of effluent that may be released offsite, and no increase in individual or cumulative occupational radiation exposures.

6. *Any proposed compensatory measure(s).*

Compensatory measures have been implemented to assure the availability of offsite power and reliable Division I power. These measures will remain in effect until the Division II EDG is returned to service. The following provisions are in place:

A "protected train" philosophy has been implemented with no work on Division I systems without shift superintendent approval. This limitation is to maintain the availability of offsite power and further protect the Division I components. Shift crews have been briefed on this condition to further ensure the availability of plant systems. Areas around protected systems and their power supplies are being controlled by physical barriers/signs requiring personnel to contact the control room prior to entry. Pre-job briefings will be performed prior to performing any activities in the controlled areas.

The Division I EDG rooms have been closed for any unnecessary entry. No work or tests will be performed on this unit until the Division II EDG is returned to service.

Division I EDG and offsite transmission lines will be monitored at least once every six hours in accordance with Operations Procedure OSP-0028, "Normal Switchgear, Control, and Diesel Generator Building Rounds."

The work ongoing is minimized since this is a holiday weekend. The surveillance requirements required to be completed during this period weekend are; the APRM flow biased tests of specification 3.3.1.1 and the weekly Division I battery tests of specification 3.8.6. The maintenance crews performing this testing will be briefed on the significance of the work.

Discussion with the distribution center determined that the grid is currently stable with no expected perturbations during the duration of the requested discretionary period. Weather forecast for the vicinity are being monitored for potential impact to grid stability due to inclement weather. In addition the local distribution center has been made aware of current plant conditions and have been informed to contact the plant if any grid transients are anticipated.

In addition to the above the NRC imposed conditions on the approval of this request, as identified in the cover letter. In summary the conditions are; the enforcement discretion expires if the plant trips, if the EDG condition can not be repaired within the extended AOT and no longer than 0700 hours on 1/3/96.

7. *The justification for the duration of the noncompliance.*

The schedule for returning the Division II EDG to service indicates that the required repairs and testing are expected to be completed within 48 hours (Two pages included as an addendum to this enclosure.) An additional 24 hours is being requested, for a total of 72, as a conservative measure so that sufficient time is available to ensure that all issues are resolved prior to placing the EDG into service.

8. *A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant Onsite Review Committee, or its equivalent).*

A meeting of the River Bend Station Facility Review Committee was held on December 31, 1995 which has approved the request for enforcement discretion.

9. *The request must specifically address how one of the NOED criteria for appropriate plant conditions specified in Section B is satisfied.*

Enforcement discretion is being requested to prevent a plant shutdown which, discounting enforcement discretion, will be required beginning December 31, 1995. Considering the existing condition, the current corrective action plan, and the period of time requested for discretion, this extension does not constitute a significant reduction in the overall protection of the public health and safety. An additional 72 hours is being requested to repair a lube oil cooler leak and return the Division II EDG

to service. Approval of this request will prevent EOI a plant shutdown and the associated transients as discussed in NOED criteria B.1.

10. *If a follow-up license amendment is required, the NOED request must include marked-up TS pages showing the proposed TS changes. The actual license amendment request must follow within 48 hours.*

This is a one time request for enforcement discretion. No TS amendment is required.

11. *A statement that prior adoption of approved line-item improvements to the TS or the ITS would not have obviated the need for the NOED request.*

No previous changes have been requested.

12. *Any other information the NRC staff deems necessary before making a decision to exercise enforcement discretion.*

No additional information was requested by the NRC. Additional conditions restricting the time of the request were identified by the NRC and are included in the cover letter. The request has been approved by the NRC in a phone conference on the morning of December 31, 1995.

# DIV II DIESEL GENERATOR FIX

RUN DATE 31DEC95 00 00  
 PLOTFILE DG2FIX  
 PROJECT DIV II D/G FIX  
 PRA DGFIX

95	DEC	96	JAN
30	31	1	2
		3	DAY

[31DEC95 07 00]

- 1
- AS= 30DEC95 19:00 ■ AF= 30DEC95 20:00  
 100 TOP SIDE ENGINE INSPECTION
- AS= 30DEC95 19:00 ■ AF= 30DEC95 21:00  
 101 PULL INJECTORS
- AS= 30DEC95 20:00 ■ AF= 30DEC95 21:00  
 102 BORO SCOPE
- 4
- AS= 31DEC95 02:00 ■ EF= 31DEC95 08:00  
 400 MAIN LUBE OIL SUMP SWABBING
- ES= 31DEC95 08:00 ■ EF= 31DEC95 14:00  
 405 MAIN SUMP FOOT VALVE INSPECTION
- 5
- AS= 30DEC95 21:00 ■ EF= 31DEC95 09:00  
 500 LUBE OIL FILTER CHANGE
- 6
- AS= 30DEC95 21:00 ■ EF= 31DEC95 09:00  
 600 LUBE OIL STRAINER CHANGE
- 7
- AS= 30DEC95 21:00 ■ AF= 31DEC95 01:00  
 700 DRAIN JACKET WATER COMPLETELY (STANDPIPE, COOLERS, & ENGINE)
- AS= 30DEC95 21:00 ■ AF= 31DEC95 02:00  
 705 DRAIN LUBE OIL
- AS= 30DEC95 22:00 ■ AF= 30DEC95 23:00  
 710 INSPECT AND TEST LUBE OIL COOLER
- AS= 30DEC95 23:00 ■ EF= 31DEC95 10:00  
 715 PLUG LEAKS IF FOUND & REASSEMBLE HX
- 9
- AS= 30DEC95 22:00 ■ AF= 31DEC95 01:00  
 900 PREPARE JOB PLAN FOR PISTON REMOVAL
- AS= 30DEC95 22:00 ■ AF= 31DEC95 01:00  
 905 PREPARE FOR PULLING HEAD AND PISTON
- AS= 31DEC95 00:00 ■ AF= 31DEC95 01:00  
 950 OPS TO EVALUATE PROCEDURES & STREAMLINE STARTUP
- AS= 31DEC95 01:00 ■ AF= 31DEC95 06:00  
 910 REMOVE HEAD & PISTON

# DIV II DIESEL GENERATOR FIX

RUN DATE 31DEC95 00 00  
 PROFILE DG2FIX  
 PROJECT DIV II D/G FIX  
 PRR DGFIX

95	DEC	96	JAN		
30	31	1	2	3	DAY

- AS= 31DEC95 06 00 [ ] EF= 31DEC95 09 00
- 975 STAGE & LAYOUT HOSES FOR FILLING JACKET WATER FROM PAP & SERV BLDG WTR HEATER
- ES= 31DEC95 09 00 [ ] EF= 31DEC95 10 00
- 916 TAKE MEASUREMENTS
- ES= 31DEC95 09 00 [ ] EF= 31DEC95 11 00
- 917 REPLACE BEARINGS
- ES= 31DEC95 09 00 [ ] EF= 31DEC95 12 00
- 915 INSPECT & HONE CYLINDER LINER
- ES= 31DEC95 12 00 [ ] EF= 31DEC95 16 00
- 920 CLEAN AND VISUAL INSPECT BLOCK TOP
- ES= 31DEC95 16 00 [ ] EF= 31DEC95 20 00
- 525 CLEAN AND VISUAL INSPECTION OF CRANK
- ES= 31DEC95 20 00 [ ] EF= 31DEC95 22 00
- 970 INSTALL COVERS
- ES= 31DEC95 20 00 [ ] EF= 01JAN96 08 00
- 930 REINSTALL PISTON HEAD AND SUBCOVER
- ES= 01JAN96 01 00 [ ] EF= 01JAN96 02 00
- 985 START HEATING LUBE OIL IN DRUMS
- ES= 01JAN96 02 00 [ ] EF= 01JAN96 08 00
- 989 FILL LUBE OIL
- ES= 01JAN96 04 00 [ ] EF= 01JAN96 08 00
- 987 FILL JACKET WATER
- ES= 01JAN96 08 00 [ ] EF= 01JAN96 09 00
- 980 PARTIAL RELEASE TAGOUT TO START JW AND LUBE OIL WARM UP
- ES= 01JAN96 08 00 [ ] EF= 01JAN96 10 00
- 935 FINISH FILLING LUBE OIL & JACKET WATER
- ES= 01JAN96 08 00 [ ] EF= 01JAN96 10 00
- 931 INSTALL INJECTORS
- ES= 01JAN96 10 00 [ ] EF= 01JAN96 11 00
- 955 RESTORE ENGINE & AIR ROLL 2 TIMES
- ES= 01JAN96 11 00 [ ] EF= 02JAN96 03 00
- 945 PERFORM BREAK IN RUNS & CYLINDER CHECKS
- ES= 02JAN96 03 00 [ ] EF= 02JAN96 05 00
- 960 STP-309-0201 OPERABILITY STP
- ES= 02JAN96 05 00 [ ] EF= 02JAN96 06 00
- 965 CLOSE OUT PAPERWORK DCIP