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CP-202000262
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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Ref 10 CFR 50.55a

04/10/2020

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)
DOCKET NO. 50-446
SNUBBER TESTING AND SNUBBER VISUAL EXAMINATIONS RELIEF REQUESTS

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(2), "Hardship without a compensating increase in quality and safety", Vistra Operations Company LLC (Vistra OpCo) hereby requests Nuclear Regulatory Commission (NRC) approval to extend scheduled CPNPP snubber testing and snubber visual examinations from the Unit 2 spring 2020 refueling outage (2RF18) to the Unit 2 fall 2021 refueling outage (2RF19) due to COVID-19 issues.

On March 13, 2020, President Donald Trump declared the Coronavirus (COVID-19) pandemic a national emergency. In addition, Texas Governor Greg Abbott declared a state of disaster due to the COVID-19 pandemic on March 13, 2020. The U.S. Center for Disease Control (CDC) has determined that COVID-19 virus poses a serious public health risk. The CDC identified the majority of U.S. states reporting community spread of COVID-19. Currently CPNPP is operating in accordance with the CPNPP Pandemic Response Guideline. Due to the COVID-19 pandemic, there is a desire to minimize the potential of inadvertently spreading the COVID-19 virus to CPNPP personnel from outside contractors who perform examinations for the snubber testing and snubber visual examination. Due to the potential spread of COVID-19 virus to CPNPP personnel, Vistra OpCo has identified performance of these examinations as a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2). As an alternative, Vistra OpCo is proposing to delay the inspections for one refueling cycle from spring 2020 (2RF18) to fall 2021 (2RF19).

These augmented examinations in the Unit 2 ISI program are delineated by American Society of Mechanical Engineers (ASME) section ISTD-4200 for snubber visual examinations and ISTD-5200 for snubber testing.

CPNPP has identified relief requests that will be required to minimize the spread of the COVID-19 virus. The identified relief requests are listed in the Attachment. Each relief request is included as an Enclosure. CPNPP requests approval of these relief requests on or before April 14, 2020.

This communication contains no new commitments.

Should you have any questions, please contact James Barnette at (254) 897-5866 or james.barnette@luminant.com.

Sincerely,

Steven K. Sewell

Attachment Relief Request List

Enclosures
1. CPNPP Unit 2, SNUBBER TESTING (SNB-1)
2. CPNPP Unit 2, SNUBBER VISUAL EXAMINATIONS (SNB-2)

c - Scott Morris, Region IV [Scott.Morris@nrc.gov]
Dennis Galvin, NRR [Dennis.Galvin@nrc.gov]
John Ellegood, Senior Resident Inspector, CPNPP [John.Ellegood@nrc.gov]
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Relief Request List

2RF18 SNUBBER Testing Deferral (SNB-1)	
Regulation Number	10 CFR 50.55a
Regulation Name	Codes and Standards
Regulation Exemption being requested under	10 CFR 50.55a(z)(2)
Basis for Exemption	10 CFR 50.55a(z)(2)
Code Allowance	ISTD-5200
Mitigations Measures	Normal compliance will be restored following CPNPP, Unit 2, Cycle 19 in 2RF19
Date Exemption Needed	April 14, 2020

2RF18 SNUBBER Visual Examinations Deferral (SNB-2)	
Regulation Number	10 CFR 50.55a
Regulation Name	Codes and Standards
Regulation Exemption being requested under	10 CFR 50.55a(z)(2)
Basis for Exemption	10 CFR 50.55a(z)(2)
Code Allowance	ISTD-4200
Mitigations Measures	Normal compliance will be restored following CPNPP, Unit 2, Cycle 19 in 2RF19
Date Exemption Needed	April 14, 2020

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(2)

—Hardship without a compensating increase in quality and safety—

1. ASME Code Component(s) Affected

Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 snubbers that are within the scope of the ASME OM Code as listed in Table 1, "Snubber Tests Requested for Deferral to 2RF19."

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through the 2006 Addenda.

3. Applicable Requirement

ISTD-5240, Test Frequency, which states in part:

> Tests of snubbers from the facility shall be performed every fuel cycle…

ISTD-5500, Retests of Previously Unacceptable Snubbers, which states in part:

> Snubbers placed in the same location, as snubbers that failed the previous inservice operational readiness test shall be retested at the time of the next operational readiness testing unless the cause of the failure is clearly established and corrected…

4. Reason for Request

Pursuant to 10 CFR 50.55a, Codes and standards, paragraph (z)(2), Vistra Operations Company LLC (Vistra OpCo) is requesting authorization for a one-time Snubber Program interval extension from the upcoming Spring 2020 refueling outage (2RF18) to the next refueling outage (2RF19) for specific CPNPP Unit 2 dynamic restraints (snubbers) due to occupational health and safety concerns associated with pandemic related issues pertaining to the Coronavirus Disease 2019 (COVID-19) virus outbreak. 2RF19 is currently scheduled for the fall of 2021. For the identified applicable paragraphs, relief is being sought for alternative treatments described in Section 5 of this Relief Request (RR) based on the existence of satisfactory snubber operational readiness performance data and that compliance would involve activities that would be detrimental to the occupational health and safety of the workforce and result in the potential to spread the virus. The basis of the request is that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current COVID-19 pandemic.

Subsection ISTD 5240 requires snubbers to be tested for operational readiness during each fuel cycle. The number of snubbers to be tested is based on a sample test plan defined by article ISTD-5260, "Testing Sample Plans."

CPNPP Unit 2 groups their program snubbers into two (2) Defined Test Plan Groups (DTPGs). The 10% test plan is used for steam generator snubbers and the 37 sample plan is used for the balance, which are all mechanical snubbers. Using the appropriate sample plan, a selection of snubbers is chosen for operational readiness testing during each fuel cycle. Table 1 represents the population of snubbers scheduled to be tested under the snubber test plan for the 2RF18 refueling outage.

To prevent the spread of COVID-19 virus at CPNPP Unit 2 and to protect the health and safety of plant personnel while maintaining responsibilities to support critical infrastructure, Vistra OpCo is reducing activities associated with the 2RF18 outage, which is scheduled to begin on April 19, 2020. As discussed in this RR, it has been determined that close contact required to perform snubber testing would be detrimental to the occupational health and safety of the workforce and result in the potential to spread the virus. Additionally, the station may experience critical shortages of specially trained and qualified personnel due to illness, which will greatly affect completion of these required tests during the current refueling outage. These tests require technicians with unique experience, and other support personnel (e.g., scaffold builders, radiation protection technicians, and other maintenance personnel). Accordingly, Vistra OpCo is requesting approval of this relief on an expedited basis.

The United States government declared a national emergency associated with the COVID-19 virus outbreak on March 13, 2020. In addition, the state of Texas, where CPNPP-2 is located, issued an Emergency Disaster Declaration on March 23, 2020, to take actions necessary to reduce exposure to the virus associated with the COVID-19 virus outbreak. This declaration has subsequently been updated to mandate a 14-day self-quarantine period for air travelers flying to Texas from certain areas experiencing substantial spread of COVID-19 virus. The Centers for Disease Control (CDC) is recommending social distancing as it applies to COVID-19 virus. The CDC defines social distancing as "remaining out of congregate settings, avoiding mass gatherings, and maintaining distance (approximately 6 feet or 2 meters) from others when possible." In the case of snubber testing at CPNPP Unit 2, the required work is performed inside enclosed test trailers, where this CDC recommendation cannot be effectively implemented.

Due to the hardships caused by the COVID-19 pandemic and in an effort to comply with CDC guidance, Vistra OpCo is requesting one-time relief associated with performing certain snubber testing. The hardship caused by the current national emergency is twofold.

1. Implementation of the test plan described in this request requires the support of contract personnel assembled from various locations. These individuals are supplied from companies with unique experience and qualifications in the testing and assessing of dynamic restraints including the operation of contractor-provided test equipment. Contract individuals previously scheduled for support of the 2RF18 refueling outage have notified CPNPP Unit 1 that they may not be able to provide their scheduled outage support. Since replacement personnel are not readily available this is considered an emergent condition with less than two weeks before the start of the 2RF18 refueling outage. Staffing of the outage with qualified individuals needed to perform the required snubber testing is a hardship without a known resolution.

2. The existing staff of CPNPP Unit 2 contains critical personnel who are necessary to complete 2RF18 refueling outage activities, return the unit safely to service, and to maintain the unit operational to meet its power demands. Bringing contract personnel on site with unknown medical history and their potential exposure to COVID-19 virus increases the risks of infecting the CPNPP-2 personnel with COVID-19 virus. It is an extreme hardship for CPNPP Unit 2 to quarantine incoming contractors for sufficient durations to ensure they are free of COVID-19 virus symptoms or to conduct adequate testing of all contractors for COVID-19 virus. However, without these safeguards, the CPNPP-2 staff and surrounding community are at increased risk of contracting COVID-19 virus, which has the potential of affecting the outage and future operation of the station.

Section 5 of this RR demonstrates that there is reasonable assurance that the operational readiness of each identified snubber will be maintained through the next refueling outage currently scheduled for the fall of 2021 (2RF19). The technical justification utilizes available data from the last 10 years of snubber testing and includes a review of the service life monitoring history for the snubber population. This provides the technical justification necessary to show that the proposed alternative to extend the testing interval by deferring the snubber testing in 2020 until the next refueling outage in the fall of 2021 is acceptable and provides reasonable assurance that the snubbers maintain operational readiness.

5. Proposed Alternative and Basis for Use

Vistra OpCo is requesting this one-time relief associated with performing the identified snubber testing activities pursuant to 10 CFR 50.55a(z)(2) on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current pandemic due to the COVID-19 outbreak. Vistra OpCo proposes this one-time relief from the following ASME OM Code requirements and provides the proposed alternative testing as follows:

1. ISTD-5240 requires that tests of snubbers from the facility shall be performed every fuel cycle. Vistra OpCo proposes to alternatively defer these CPNPP-2 snubber tests to the next refueling outage currently scheduled for fall of 2021 (2RF19).

2. ISTD-5500 requires that snubbers placed in the same location as snubbers that failed the previous inservice operational readiness test shall be retested at the time of the next operational readiness testing unless the cause of the failure is clearly established and corrected. Vistra OpCo proposes to alternatively defer the retest of select snubbers at CPNPP-2 until the next refueling outage currently scheduled for fall of 2021 (2RF19).

Based on the CPNPP Unit 2 snubber test history, the elimination of snubber testing during refueling outage 2RF18 will not impact the ability of the untested snubbers to perform their intended safety function until refueling outage 2RF19 when testing will resume. In the last 10 years, 241 snubbers have been tested with only three (3) snubber test failures that occurred during the fall of 2018 (2RF17). The test failures occurred in the Reactor Coolant (RC) and Chemical and Volume Control (CS) systems of the mechanical snubber DTPG and were evaluated with corrective action taken per the CPNPP corrective action program. The evaluation of these failures concluded that the piping systems to which these snubbers were attached all remained within design parameters and would have fulfilled their safety functions. All three snubbers failed the drag function test and are described

in more detail below:

Snubber RC-2-RB-028-701-1 failed due to a slightly higher drag value than allowed by the acceptance criteria. This snubber was subsequently disassembled, and it was observed that the Anti-Rotation Key had become dislodged from the Inner Tube and captured between the Inner Tube and Rod and Bearing Assembly. This resulted in a slightly higher drag force and that exceeded the acceptance criteria by less than 1 pound. A search of Operating Experience did not identify a failure with the same cause, and a review of the CPNPP-2 snubber database showed that functional testing of 24 identical snubbers had been performed between 2RF13 and 2RF17 with no similar failures. Therefore, this event was determined to be an isolated failure per ISTD-5422. The evaluation also concluded there was no impact to system operability. This snubber was replaced by an acceptable spare.

Snubber CS-2-RB-061-704-1 failed due to significantly higher drag than allowed by the acceptance criteria. Upon disassembly, it was observed that the Torque Carrier and Shaft Assembly was bent and each end of the assembly, where the ball bearings sit, was flared outward indicating that a transient caused the damage. To evaluate the extent of condition, the upstream and downstream snubbers were inspected, unpinned, and hand stroked through their full range of travel and found to be acceptable. Further review indicated that no fluid type transients are possible for this line. Therefore, the cause of the transient was determined to be a mishandling event or the snubber being struck by an external load not associated with an operational event. The evaluation also concluded there was no impact to system operability. This snubber was replaced by an acceptable spare.

Snubber RC-2-135-402-C41K was observed to have a possible damaged pin and spherical bearing. Upon removal for testing, this snubber appeared to be locked up; however, after testing was completed, the snubber was not locked up but was confirmed to have a very high drag value, which did not meet the acceptance criteria. There was dry grease observed inside of the snubber, due to the high temperature of the piping to which it was installed. It was also noted that the snubber body mass was installed toward the piping rather than away from the piping (heat source), which would also contribute to the grease degradation. An expansion sample of 19 snubbers was randomly selected from systems containing hot fluid and functionally tested as additional scope. No other failures were found in the expansion sample. Additionally, an extent of condition evaluation reviewed all snubbers in all four loop rooms. A certified VT-3 inspector inspected for like damage and configuration. Of the 376 snubbers inspected, none were found with like damage (i.e. damaged load pin or spherical bearing). Of all the snubbers evaluated where the snubber body was closer to the heat source (90 total), 19 had previously been tested and were found to be acceptable. Of the 71 snubbers remaining, 8 (or 10%) were unpinned and fully stroked by hand – no adverse conditions were identified. The evaluation concluded there was no impact to system operability and provided reasonable assurance that the dry grease condition did not exist elsewhere in the snubber population. Snubber RC-2-135-402-C41K was replaced by an acceptable spare ensuring the snubber body mass was installed away from the piping (heat source).

The snubber population at CPNPP Unit 2 has been operating at a high level of performance for the past ten years and this performance provides reasonable assurance

that the entire CPNPP Unit 2 snubber population will be capable of performing their required safety function over the extended interval proposed.

Since 2RF17, there have been no dynamic events or transients during operation that might affect snubber performance or place a need for added emphasis on a specific snubber or group of snubbers.

There is one Title 10 Code of Federal Regulations (CFR), Part 21, "Reporting of Defects and Noncompliance," notification with the potential of affecting snubbers within the 2RF18 refueling outage sample test plan. This Part 21 notification is in relation to a batch of hydraulic fluid that was supplied to several nuclear stations. The evaluation of the related Part 21 notification for CPNPP Unit 2 determined the hydraulic fluid in question was not supplied to CPNPP Unit 2 and, therefore, would not present a safety hazard at CPNPP Unit 2.

As evidenced by the CPNPP Unit 2 operational readiness test history during the past 10 years, the snubber population is well maintained within the examination, testing and service life monitoring program and is performing well in their environment and operating conditions. There are no planned changes to the snubber environments or operating conditions that would affect the snubbers differently than represented in past surveillance testing. No deficiencies, adverse trends or open maintenance work orders were identified that would impact or degrade any snubber's performance capability and exclude it from this one-time interval extension RR. Each snubber in the scope of this RR will remain within the predicted service life interval, in accordance with ISTD-6100, "Predicted Service Life," through 2RF19. Considering the entire snubber population and the current level of acceptable performance, there is reasonable assurance that each snubber will continue to be operationally ready to perform their safety functions during the use of this RR.

In summary, based on the information provided above, snubber testing has demonstrated that the snubber population at CPNPP Unit 2 is reliable, and there have been no dynamic events or transients at CPNPP Unit 2 or recent operating experience that might affect snubber performance. Therefore, extending the testing interval for each snubber in the scope of this RR to the next refueling outage scheduled for the fall of 2021 (2RF19) would not adversely impact the function of the snubber or result in a reduction in plant safety. In the current pandemic environment, performing the required tests would result in an increased risk of virus exposure to plant personnel and a reduction in occupational health and safety without a compensating benefit. Therefore, this one-time RR meets the criteria in 10 CFR 50.55a(z)(2) for relief on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current COVID-19 pandemic.

6. Duration of Proposed Alternative

Upon approval, the proposed alternative to extend the testing interval for snubbers will be implemented at CPNPP Unit 2 starting from 2RF18, which is scheduled to commence on April 19, 2020, through the end of 2RF19, which is scheduled to begin in the fall of 2021.

7. Precedent

Similar relief to extend snubber testing due to pandemic-related issues was verbally authorized by the NRC on April 4, 2020, to Energy Harbor Nuclear Corporation for Beaver Valley Power Station Unit 2, via "Verbal Authorization by the NRC Office of Nuclear Reactor Regulation for 10 CFR 50.55a Request L-20-118-SRR-1, Revision 0, Snubber Testing," dated April 3, 2020. (ML20095J099)

Table 1 - Snubber Tests Requested for Deferral to 2RF19

#	Snubber Component	Snubber Model	Defined Test Plan Group (DTPG)	Test Required	Test History	Service Life Expiration
1	SI-2-091-408-C41K	10	PSA	Sample Plan	Tested SAT 2RF13	2033
2	RC-2-RB-074-706-2	1/4	PSA	Sample Plan	Tested SAT 2RF10	2033
3	MS-2-151-443-C52K	1	PSA	Sample Plan	Not Tested	2033
4	SI-2-RB-034-708-1	1/4	PSA	Sample Plan	Not Tested	2033
5	FW-2-SB-033-008-2	1/4	PSA	Sample Plan	Tested SAT 2RF12	2033
6	CS-2-RB-022-705-2	1/4	PSA	Sample Plan	Tested SAT 2RF13	2033
7	MS-2-344-405-C52KA	3	PSA	Sample Plan	Not Tested	2033
8	SI-2-306-424-C42K	1/2	PSA	Sample Plan	Not Tested	2033
9	CT-2-012-409-S22KA	3	PSA	Sample Plan	Tested SAT 2RF13	2033
10	MS-2-073-412-C52K	1	PSA	Sample Plan	Tested SAT 2RF10	2033
11	SI-2-148-402-C41K	10	PSA	Sample Plan	Not Tested	2033
12	CT-2-013-421-S22K	10	PSA	Sample Plan	Tested SAT 2RF10	2033
13	DO-2-038-408-D63KA	35	PSA	Sample Plan	Not Tested	2033
14	SI-2-044-701-S22K	1	PSA	Sample Plan	Tested SAT 2RF10	2033
15	CS-2-RB-013-702-1	1	PSA	Sample Plan	Tested SAT 2RF12	2033
16	DO-2-038-408-D63K	35	PSA	Sample Plan	Tested SAT 2RF02	2033
17	RC-2-112-402-C86K	3	PSA	Sample Plan	Not Tested	2033
18	RC-2-111-402-C81K	3	PSA	Sample Plan	Tested SAT 2RF12	2033
19	FW-2-097-708-C62K	10	PSA	Sample Plan	Tested SAT 2RF11	2033
20	CS-2-SB-100-001-5A	1/2	PSA	Sample Plan	Tested SAT 2RF08	2033
21	MS-2-002-405-C72K	100	PSA	Sample Plan	Tested SAT 2RF02	2033
22	CT-2-024-408-S22K	3	PSA	Sample Plan	Not Tested	2033
23	FW-2-019-411-C42K	100	PSA	Sample Plan	Not Tested	2033
24	CS-2-AB-071-009-5	1/4	PSA	Sample Plan	Tested SAT 2RF10	2033
25	CT-2-013-441-C62KA	10	PSA	Sample Plan	Not Tested	2033
26	MS-2-RB-038-001-2A	1/4	PSA	Sample Plan	Not Tested	2033
27	SI-2-303-402-C41K	1/2	PSA	Sample Plan	Tested SAT 2RF16	2033
28	SI-2-RB-014B-701-2	1	PSA	Sample Plan	Not Tested	2033
29	MS-2-001-405-C72K	35	PSA	Sample Plan	Tested SAT 2RF12	2033
30	MS-2-151-424-C52K	1	PSA	Sample Plan	Tested SAT 2RF06	2033
31	SI-2-088-410-C42K	3	PSA	Sample Plan	Not Tested	2033
32	AF-2-102-416-S33K	3	PSA	Sample Plan	Tested SAT 2RF02	2033
33	CS-2-RB-023-701-1	1/4	PSA	Sample Plan	Tested SAT 2RF06	2033
34	RH-2-064-402-S22K	1	PSA	Sample Plan	Tested SAT 2RF08	2033
35	SI-2-RB-061-704-1	1/2	PSA	Sample Plan	Not Tested	2033
36	RC-2-RB-060-701-1	1	PSA	Sample Plan	Tested SAT 2RF17	2033
37	MS-2-151-426-C52K	1	PSA	Sample Plan	Tested SAT 2RF12	2033
38	RC-2-135-402-C41K	35	PSA	Retest	Tested SAT 2RF17	2033
39	TCX-RCESHS-17	1000	PM	Sample Plan	Tested SAT 2RF11	2033

NOTE: The service life of all CPNPP Unit 2 snubbers is based on 40 years of expected service, (based on manufacturer's recommendation) and is evaluated each refueling outage to make adjustments, if needed. Due to the performance of the CPNPP Unit 2 snubber population, there has not been a need to adjust the service life of any snubber location to date.

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(2)

—Hardship without a compensating increase in quality and safety—

1. ASME Code Component(s) Affected

Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 snubbers that are within the scope of the ASME OM Code as listed in Table 1, "Snubber Visual Examinations Requested for Deferral to 2RF19."

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through the 2006 Addenda.

3. Applicable Requirement

ISTD-4200, Inservice Examination, states:

> Snubbers shall be visually examined on the required schedule and evaluated to determine their operational readiness.

ASME OM Code Case OMN-13, Revision 0, Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants, subparagraph 3.7, Frequency of Examinations, which states, in part:

> All snubbers within the scope of ISTD shall be examined and evaluated per paras. ISTD 6.1, ISTD 6.3, and ISTD 6.4 at least once every 10 years.

4. Reason for Request

Subsection ISTD-4200 requires snubbers to be visually examined on the required schedule to determine their operational readiness. Since CPNPP Unit 2 is using Code Case OMN-13, Revision 0, the current interval schedule for snubber visual examination is not to exceed 10 years.

CPNPP Unit 2 last completed 100% visual examinations of the snubber population during 2RF12 in the spring of 2011. Since that time, 317 visual examinations were performed during 2RF17 in the fall of 2018, with the balance of 506 visual examinations scheduled to be completed during 2RF18 in the spring of 2020. Visual examinations that are not completed during 2RF18 would exceed the 10-year maximum interval allowed by Code Case OMN-13, Revision 0 by approximately 6 months.

Pursuant to 10 CFR 50.55a, Codes and standards, paragraph (z)(2), Vistra Operations Company LLC (Vistra OpCo) is requesting authorization for a one-time Snubber Program examination interval extension to the next refueling outage (2RF19) for specific CPNPP Unit 2 dynamic restraints (snubbers) scheduled for visual examination due to occupational health and safety concerns associated with pandemic related issues pertaining to the Coronavirus Disease 2019 (COVID-19) outbreak. 2RF19 is currently scheduled for the fall of 2021. Relief is being sought for alternative treatments to the snubber requirements as described in Section 5 of this Relief Request (RR), based on the existence of

satisfactory snubber visual examination and operational readiness testing performance data, and that compliance would involve activities that would be detrimental to the occupational health and safety of the workforce resulting in the potential to spread the COVID-19 virus. The basis of this request is that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current pandemic.

To prevent the spread of COVID-19 virus at CPNPP Unit 2, and to protect the health and safety of plant personnel while maintaining responsibilities to support critical infrastructure, Vistra OpCo is reducing activities associated with the 2RF18 outage, which is scheduled to begin on April 19, 2020. As discussed in this RR, it has been determined that close contact required to perform snubber visual examinations would be detrimental to the occupational health and safety of the workforce and result in the potential to spread the virus. Additionally, the station may experience critical shortages of qualified personnel due to illness, which will greatly affect completion of these required examinations during the current refueling outage. These visual examinations (VT-3) require qualified technicians, and other support personnel (e.g., scaffold builders, radiation protection technicians, and other maintenance personnel). ASME Section XI IWA-2300 gives specific requirements per ASME Section XI and ANSI/ASNT CP-189 for VT-3 examiners. CPNPP has a limited number of site Nondestructive Examination (NDE) personnel capable of performing VT-3 examinations. CPNPP has relied solely on contracted personnel to perform VT-3 snubber examinations since Commercial Operation. These contracted personnel are very proficient and accustomed to performing snubber examinations. The site personnel qualified to perform VT-3 examinations at CPNPP are Quality Control inspectors that also support many other critical outage activities. The availability of these personnel is extremely limited due to these other activities. Accordingly, Vistra OpCo is requesting approval of this relief on an expedited basis.

The United States government has declared a national emergency associated with the COVID-19 virus outbreak on March 13, 2020. In addition, the state of Texas, where CPNPP Unit 2 is located, issued an Emergency Disaster Declaration on March 23, 2020, to take actions necessary to reduce exposure to the virus associated with the COVID-19 virus outbreak. This declaration has subsequently been updated to mandate a 14-day self-quarantine period for air travelers flying to Texas from certain areas experiencing substantial spread of COVID-19 virus. The Centers for Disease Control (CDC) is recommending social distancing as it applies to COVID-19 virus. The CDC defines social distancing as "remaining out of congregate settings, avoiding mass gatherings, and maintaining distance (approximately 6 feet or 2 meters) from others when possible." In the case of snubber visual examinations at CPNPP Unit 2, two-man teams perform the required work in close proximity; therefore, this CDC recommendation cannot be effectively implemented.

Due to the hardships caused by the COVID-19 pandemic and in an effort to comply with CDC guidance, Vistra OpCo is requesting one-time relief associated with performing certain snubber visual examinations. The hardship caused by the current national emergency is twofold.

1. Implementation of the scheduled visual examinations described in this request requires the support of contract personnel assembled from various locations. These individuals are supplied from companies with specific experience and qualifications in the visual examination of dynamic restraints including the operation of examination equipment. Contract individuals, previously scheduled for support of the 2RF18

refueling outage, have notified CPNPP Unit 2 that they may not be able to provide the scheduled outage support. Since replacement personnel are not readily available, this is considered an emergent condition with less than two weeks before the start of the 2RF18 refueling outage. Staffing of the outage with qualified individuals needed to perform the required snubber examinations is a hardship without a known resolution.

2. The existing staff of CPNPP Unit 2 contains critical personnel who are necessary to complete 2RF18 refueling outage activities, return the unit safely to service, and to maintain the unit operational to meet its power demands. Bringing contract personnel on site with unknown medical history and their potential exposure to COVID-19 virus increases the risks of infecting the CPNPP Unit 2 personnel with COVID-19 virus. It is an extreme hardship for CPNPP Unit 2 to quarantine incoming contractors for sufficient durations to ensure they are free of COVID-19 virus symptoms or to conduct testing of contractors for COVID-19 virus. However, without these safeguards, the CPNPP Unit 2 staff and surrounding community is at increased risk of contracting COVID-19 virus, which has the potential of affecting the outage and future operation of the station.

Section 5 of this RR demonstrates that there is reasonable assurance that the design function of each identified snubber will be maintained through the next refuel outage currently scheduled for the fall of 2021 (2RF19). The technical justification utilizes available data from the last 10 years of snubber examination and testing, and a review of the service life monitoring history for the snubber population. This provides the technical justification necessary to show that the proposed alternative to extend the examination interval by deferring the examinations in 2020 until the next refueling outage in the fall of 2021 is acceptable and will not result in an adverse consequence to safety.

5. Proposed Alternative and Basis for Use

Vistra OpCo is requesting this one-time relief associated with performing the identified snubber visual examinations pursuant to 10 CFR 50.55a(z)(2) on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current pandemic due to the COVID-19 virus outbreak. Vistra OpCo proposes this one-time relief from the following ASME Code requirements and provides proposed alternative treatment as follows:

1. ISTD-4200 requires that snubbers shall be visually examined on the required schedule and evaluated to determine their operational readiness.

   ASME OM Code Case OMN-13, subparagraph 3.7, requires that all snubbers within the scope of ISTD shall be examined and evaluated at least once every 10 years.

   Alternatively, Vistra OpCo proposes to extend this 10-year interval for snubber examination and evaluation through the end of the next refueling outage currently scheduled for the fall of 2021 (2RF19).

Based on the CPNPP Unit 2 snubber visual examination history, the elimination of snubber visual examinations during refueling outage 2RF18 will not impact the ability of snubbers not examined to perform their intended safety function until refueling outage 2RF19 when visual examinations will be completed. Since 2011, there have been a total of 1,140 visual examinations of program snubbers, completed with only three (3) visual examination issues identified. Of the three (3) visual examination issues identified during 2RF17, only

one (1) (RC-2-135-402-C41K) resulted in a test failure due to high drag value in the Reactor Coolant (RC) system from the mechanical snubber population. This occurrence was documented, evaluated, and corrective action was taken per the CPNPP corrective action program. The other two (2) snubbers were tested and found to be within the acceptance criteria.

In addition, during that timeframe, there have been approximately 241 tests of program snubbers with only three (3) snubber test failures that occurred during the fall of 2018 (2RF17) (RC-2-RB-028-701-1, CS-2-RB-061-704-1, RC-2-135-402-C41K). These test failures occurred in the Reactor Coolant (RC) and Chemical and Volume Control (CS) systems of the mechanical snubber Defined Test Plan Groups (DTPG) and were evaluated with corrective action taken per the CPNPP corrective action program. The evaluation of these failures concluded that the piping systems to which these snubbers were attached all remained within design parameters and would have fulfilled their safety functions. Although all three snubbers failed the drag function test, subsequent extent of condition testing and inspections and operating experience review provided reasonable assurance that no other snubbers in the CPNPP Unit 2 snubber population were affected by the same condition. The snubber population at CPNPP Unit 2 has been operating at a high level of performance for the past ten years and this performance provides reasonable assurance that the entire CPNPP Unit 2 snubber population will be capable of performing their required safety function over the extended interval proposed.

Since 2RF17, there have been no dynamic events or transients during operation that might affect snubber performance or place a need for added emphasis on a specific snubber or group of snubbers.

There are no Title 10 Code of Federal Regulations, Part 21, Reporting of Defects and Noncompliance, notifications with the potential of affecting observable characteristics of snubbers within the 2RF18 refueling outage scheduled examinations and, therefore, would not present a safety hazard at CPNPP Unit 2.

As evidenced by a review of the CPNPP Unit 2 examination and testing history during the past 10 years, the snubber population is well maintained within the examination, testing and service life monitoring program and is performing well in the environment and operating conditions. There are no planned changes to the snubber environments or operating conditions that would affect the snubbers differently than represented in past operating history. No deficiencies, adverse trends or open maintenance work orders were identified that would impact or degrade any snubber's performance capability and exclude it from this interval extension RR. Each snubber included in the scope of this RR will remain within its predicted service life, in accordance with ISTD-6100, Predicted Service Life, through the end of 2RF19. Considering the entire snubber population and the current level of acceptable performance, there is reasonable assurance that each snubber will continue to be operationally ready to perform their safety functions during the use of this RR.

In summary, a review of the snubber program information discussed above, has demonstrated that the snubber population at CPNPP Unit 2 is reliable, and there have been no dynamic events or transients at CPNPP Unit 2 or recent operating experience that might affect snubber performance. Therefore, extending the visual examination interval for the snubbers subject to the OMN-13 defined interval of 10 years to the next refueling outage scheduled for the fall of 2021 (2RF19) would not adversely impact the function of the snubber population or result in a reduction in plant safety. In the current

pandemic environment, performing the required examinations would result in an increased risk of virus exposure to plant personnel and a reduction in occupational health and safety without a compensating benefit. Therefore, this one-time RR meets the criteria in 10 CFR 50.55a(z)(2) for relief on the basis that compliance results in hardship or unusual difficulty without a compensating increase in level of quality or safety during the current COVID-19 pandemic.

6. Duration of Proposed Alternative

Upon approval, the proposed alternative to extend the visual examination interval for snubbers within the OMN-13 scope will be implemented at CPNPP Unit 2 starting from 2RF18, which commences on April 19, 2020, through the end of 2RF19, which is scheduled to begin in the fall of 2021.

7. Precedence

Similar relief to extend snubber testing due to pandemic-related issues was verbally authorized by the NRC on April 4, 2020, to Energy Harbor Nuclear Corporation for Beaver Valley Power Station Unit 2, via "Verbal Authorization by the NRC Office of Nuclear Reactor Regulation for 10 CFR 50.55a Request L-20-118-SRR-1, Revision 0, Snubber Testing," dated April 3, 2020. (ML20095J099)

Although not specifically authorized for snubber testing, similar relief to extend ASME OM Code testing due to pandemic-related issues pursuant to the requirements of 10 CFR 50.55a(z)(2) was verbally authorized by the NRC for Exelon Generation Company, LLC, to use at Limerick Generating Station, Unit 1, via "Verbal Authorization by the NRC Office of Nuclear Regulation for Relief Request GVRR-9 Associated with Pandemic-Related Issues – Inservice Testing Interval Extension Motor-Operated Valves, Docket No. 50-352 (EPID L-2020-LLR-0046)," dated March 31, 2020. (ML20090A652)

8. Reference

1. ASME OM Code Case OMN-13, Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants, Revision 0.

RELIEF REQUEST NUMBER SNB-2

Table 1-Snubber visual deferrals

Snubber Component	Snubber Model	Defined Test Plan Group	Visual Examination Due	Service Life Expiration
VA-2-006-406-C72K	10	PSA	Spring 2021	2033
TCX-RCESHS-04	1000K	PME	Spring 2021	2033
TCX-RCESHS-19	1000K	PME	Spring 2021	2033
TCX-RCESHS-17	1000K	PME	Spring 2021	2033
TCX-RCESHS-02	1000K	PME	Spring 2021	2033
SW-2-132-026-A43K	35	PSA	Spring 2021	2033
SW-2-132-016-A43K	3	PSA	Spring 2021	2033
SW-2-132-014-A43K	3	PSA	Spring 2021	2033
SW-2-129-402-A43K	10	PSA	Spring 2021	2033
SW-2-129-004-A33KA	1	PSA	Spring 2021	2033
SW-2-129-004-A33K	1	PSA	Spring 2021	2033
SW-2-129-003-A33K	3	PSA	Spring 2021	2033
SW-2-129-001-A33K	3	PSA	Spring 2021	2033
SW-2-012-024-F33KA	10	PSA	Spring 2021	2033
SW-2-012-024-F33K	10	PSA	Spring 2021	2033
SW-2-012-022-F33KA	35	PSA	Spring 2021	2033
SW-2-012-022-F33K	35	PSA	Spring 2021	2033
SW-2-011-022-F33KA	10	PSA	Spring 2021	2033
SW-2-011-022-F33K	10	PSA	Spring 2021	2033
SW-2-011-021-F33K	35	PSA	Spring 2021	2033
SW-2-010-002-A33K	3	PSA	Spring 2021	2033
SI-2-SB-020-003-2A	1/2	PSA	Spring 2021	2033
SI-2-SB-020-003-2	1/2	PSA	Spring 2021	2033
SI-2-SB-019-003-5A	1/2	PSA	Spring 2021	2033
SI-2-SB-019-003-5	1/2	PSA	Spring 2021	2033
SI-2-RB-058-711-2	1/2	PSA	Spring 2021	2033
SI-2-RB-058-703-2	1/4	PSA	Spring 2021	2033
SI-2-RB-049-701-1	1	PSA	Spring 2021	2033
SI-2-RB-042-703-2	1/2	PSA	Spring 2021	2033
SI-2-RB-033-703-1	1/4	PSA	Spring 2021	2033
SI-2-RB-032-704-1	1/2	PSA	Spring 2021	2033
SI-2-RB-014B-707-2	1/2	PSA	Spring 2021	2033
SI-2-RB-014B-705-2	1	PSA	Spring 2021	2033
SI-2-RB-014B-704-2	1	PSA	Spring 2021	2033
SI-2-RB-014B-701-2	1	PSA	Spring 2021	2033
SI-2-RB-010C-710-2	1/2	PSA	Spring 2021	2033
SI-2-RB-010C-709-2	1/2	PSA	Spring 2021	2033
SI-2-RB-010B-716-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010B-714-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010B-712-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010B-709-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010B-708-2	1/4	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

SI-2-RB-010B-705-2	1/2	PSA	Spring 2021	2033
SI-2-RB-010B-703-2	1/2	PSA	Spring 2021	2033
SI-2-RB-010B-701-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010A-708-2	1/4	PSA	Spring 2021	2033
SI-2-RB-010A-705-1	1/4	PSA	Spring 2021	2033
SI-2-RB-010A-702-2	1/4	PSA	Spring 2021	2033
SI-2-336-403-S22K	1	PSA	Spring 2021	2033
SI-2-311-404-S22K	3	PSA	Spring 2021	2033
SI-2-311-402-S22KA	3	PSA	Spring 2021	2033
SI-2-311-402-S22K	3	PSA	Spring 2021	2033
SI-2-306-426-C42KA	3	PSA	Spring 2021	2033
SI-2-306-426-C42K	3	PSA	Spring 2021	2033
SI-2-306-425-C42K	1	PSA	Spring 2021	2033
SI-2-306-424-C42K	1/2	PSA	Spring 2021	2033
SI-2-180-403-C41K	35	PSA	Spring 2021	2033
SI-2-172-402-C41K	10	PSA	Spring 2021	2033
SI-2-105-404-C52K	10	PSA	Spring 2021	2033
SI-2-105-403-C42K	10	PSA	Spring 2021	2033
SI-2-104-404-C52K	10	PSA	Spring 2021	2033
SI-2-104-401-C42KA	3	PSA	Spring 2021	2033
SI-2-104-401-C42K	3	PSA	Spring 2021	2033
SI-2-095-413-C42KA	3	PSA	Spring 2021	2033
SI-2-095-413-C42K	3	PSA	Spring 2021	2033
SI-2-095-412-C42K	10	PSA	Spring 2021	2033
SI-2-093-408-S42K	10	PSA	Spring 2021	2033
SI-2-093-405-S32K	3	PSA	Spring 2021	2033
SI-2-093-403-S32K	3	PSA	Spring 2021	2033
SI-2-091-406-C41K	3	PSA	Spring 2021	2033
SI-2-089-403-C41K	10	PSA	Spring 2021	2033
SI-2-088-410-C42KA	3	PSA	Spring 2021	2033
SI-2-088-410-C42K	3	PSA	Spring 2021	2033
SI-2-088-409-C42KA	1	PSA	Spring 2021	2033
SI-2-088-409-C42K	1	PSA	Spring 2021	2033
SI-2-079-407-S32K	3	PSA	Spring 2021	2033
SI-2-079-404-S32K	3	PSA	Spring 2021	2033
SI-2-078-409-S42K	10	PSA	Spring 2021	2033
SI-2-078-407-S42K	3	PSA	Spring 2021	2033
SI-2-078-406-S42K	10	PSA	Spring 2021	2033
SI-2-078-405-S32K	3	PSA	Spring 2021	2033
SI-2-078-403-S32K	10	PSA	Spring 2021	2033
SI-2-078-402-S32K	3	PSA	Spring 2021	2033
SI-2-076-401-S22K	10	PSA	Spring 2021	2033
SI-2-075-401-S22K	10	PSA	Spring 2021	2033
SI-2-072-405-S32KA	10	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

SI-2-072-405-S32K	10	PSA	Spring 2021	2033
SI-2-072-402-S32K	35	PSA	Spring 2021	2033
SI-2-071-405-S32KA	3	PSA	Spring 2021	2033
SI-2-071-405-S32K	3	PSA	Spring 2021	2033
SI-2-071-404-S32KA	10	PSA	Spring 2021	2033
SI-2-071-404-S32K	10	PSA	Spring 2021	2033
SI-2-070-405-S22K	1/2	PSA	Spring 2021	2033
SI-2-051-420-C42K	1	PSA	Spring 2021	2033
SI-2-051-419-C42K	1	PSA	Spring 2021	2033
SI-2-051-418-C42KA	1	PSA	Spring 2021	2033
SI-2-051-418-C42K	1	PSA	Spring 2021	2033
SI-2-044-701-S22K	1	PSA	Spring 2021	2033
SI-2-039-416-S22K	3	PSA	Spring 2021	2033
SI-2-033-403-C41K	1/2	PSA	Spring 2021	2033
SI-2-031-439-A32K	10	PSA	Spring 2021	2033
SI-2-031-429-S32KA	10	PSA	Spring 2021	2033
SI-2-031-429-S32K	10	PSA	Spring 2021	2033
SI-2-029-424-Y32KA	35	PSA	Spring 2021	2033
SI-2-029-424-Y32K	35	PSA	Spring 2021	2033
SI-2-001-424-S42K	3	PSA	Spring 2021	2033
SB-2-060-704-E35K	3	PSA	Spring 2021	2033
SB-2-052-006-A55K	3	PSA	Spring 2021	2033
SB-2-037-708-E35K	3	PSA	Spring 2021	2033
SB-2-025-403-E25K	1	PSA	Spring 2021	2033
SB-2-023-406-E25K	3	PSA	Spring 2021	2033
SB-2-018-425-S56K	1	PSA	Spring 2021	2033
SB-2-001-436-S56K	1	PSA	Spring 2021	2033
RH-2-SB-033-003-2	1/4	PSA	Spring 2021	2033
RH-2-064-404-S22K	10	PSA	Spring 2021	2033
RH-2-064-402-S22K	1	PSA	Spring 2021	2033
RH-2-063-404-S22KA	3	PSA	Spring 2021	2033
RH-2-063-404-S22K	3	PSA	Spring 2021	2033
RH-2-028-404-S32K	3	PSA	Spring 2021	2033
RH-2-027-403-S32K	3	PSA	Spring 2021	2033
RH-2-024-410-S22K	10	PSA	Spring 2021	2033
RH-2-020-403-S22K	3	PSA	Spring 2021	2033
RH-2-020-401-S22K	3	PSA	Spring 2021	2033
RH-2-016-401-S22KA	3	PSA	Spring 2021	2033
RH-2-016-401-S22K	3	PSA	Spring 2021	2033
RH-2-015-403-S32K	3	PSA	Spring 2021	2033
RH-2-014-409-S32K	1/2	PSA	Spring 2021	2033
RH-2-014-408-S32K	1	PSA	Spring 2021	2033
RH-2-013-406-S32K	1	PSA	Spring 2021	2033
RH-2-009-403-S22K	10	PSA	Spring 2021	2033

RH-2-008-409-S22K	10	PSA	Spring 2021	2033
RH-2-008-408-S22K	10	PSA	Spring 2021	2033
RH-2-008-405-S22KA	3	PSA	Spring 2021	2033
RH-2-008-405-S22K	3	PSA	Spring 2021	2033
RH-2-008-403-S22K	10	PSA	Spring 2021	2033
RH-2-007-701-S22K	10	PSA	Spring 2021	2033
RH-2-007-407-S22K	10	PSA	Spring 2021	2033
RH-2-007-405-S22KA	3	PSA	Spring 2021	2033
RH-2-007-405-S22K	3	PSA	Spring 2021	2033
RH-2-004-404-S42K	35	PSA	Spring 2021	2033
RH-2-003-409-S32K	3	PSA	Spring 2021	2033
RH-2-003-404-S42K	10	PSA	Spring 2021	2033
RH-2-003-402-S42K	3	PSA	Spring 2021	2033
RH-2-001-408-C41K	10	PSA	Spring 2021	2033
RC-2-RB-075-704-2	1/4	PSA	Spring 2021	2033
RC-2-RB-075-702-2	1/4	PSA	Spring 2021	2033
RC-2-RB-075-701-2	1/4	PSA	Spring 2021	2033
RC-2-RB-074-706-2	1/4	PSA	Spring 2021	2033
RC-2-RB-074-704-2A	1	PSA	Spring 2021	2033
RC-2-RB-074-704-2	1/2	PSA	Spring 2021	2033
RC-2-RB-074-701-2	1/2	PSA	Spring 2021	2033
RC-2-RB-027-710-1	1/4	PSA	Spring 2021	2033
RC-2-936-008-C45K	10	PSA	Spring 2021	2033
RC-2-936-006-C45K	3	PSA	Spring 2021	2033
RC-2-935-011-C45KA	3	PSA	Spring 2021	2033
RC-2-935-011-C45K	3	PSA	Spring 2021	2033
RC-2-935-009-C45K	3	PSA	Spring 2021	2033
RC-2-162-402-C81K	1	PSA	Spring 2021	2033
RC-2-147-403-C81K	1	PSA	Spring 2021	2033
RC-2-135-408-C41K	35	PSA	Spring 2021	2033
RC-2-135-402-C41K	35	PSA	Spring 2021	2033
RC-2-115-432-C56K	35	PSA	Spring 2021	2033
RC-2-115-431-C56KA	10	PSA	Spring 2021	2033
RC-2-115-431-C56K	10	PSA	Spring 2021	2033
RC-2-088-408-C81K	3	PSA	Spring 2021	2033
RC-2-088-404-C81K	3	PSA	Spring 2021	2033
RC-2-087-407-C81K	1	PSA	Spring 2021	2033
RC-2-087-403-C81K	3	PSA	Spring 2021	2033
RC-2-069-401-C41K	35	PSA	Spring 2021	2033
MS-2-SB-032-003-2	1/2	PSA	Spring 2021	2033
MS-2-SB-031-003-2	1/2	PSA	Spring 2021	2033
MS-2-SB-030-003-2	1/4	PSA	Spring 2021	2033
MS-2-SB-029-003-2	1/2	PSA	Spring 2021	2033
MS-2-RB-030-005-2	1/4	PSA	Spring 2021	2033

MS-2-RB-009-001-2	1	PSA	Spring 2021	2033
MS-2-RB-003-001-2	1/4	PSA	Spring 2021	2033
MS-2-345-406-C52K	1	PSA	Spring 2021	2033
MS-2-274-404-S75K	3	PSA	Spring 2021	2033
MS-2-274-402-S72K	10	PSA	Spring 2021	2033
MS-2-274-401-S72K	10	PSA	Spring 2021	2033
MS-2-257-404-S72K	10	PSA	Spring 2021	2033
MS-2-257-403-S72K	35	PSA	Spring 2021	2033
MS-2-257-402-S75K	3	PSA	Spring 2021	2033
MS-2-257-401-S75K	3	PSA	Spring 2021	2033
MS-2-240-404-S75K	3	PSA	Spring 2021	2033
MS-2-240-403-S75K	3	PSA	Spring 2021	2033
MS-2-240-402-S72K	3	PSA	Spring 2021	2033
MS-2-240-401-S72K	10	PSA	Spring 2021	2033
MS-2-223-404-S75K	3	PSA	Spring 2021	2033
MS-2-223-403-S75K	3	PSA	Spring 2021	2033
MS-2-223-402-S72K	3	PSA	Spring 2021	2033
MS-2-223-401-S72K	10	PSA	Spring 2021	2033
MS-2-151-446-C52KA	3	PSA	Spring 2021	2033
MS-2-151-446-C52K	3	PSA	Spring 2021	2033
MS-2-151-444-C52K	1	PSA	Spring 2021	2033
MS-2-151-443-C52K	1	PSA	Spring 2021	2033
MS-2-151-436-C52K	3	PSA	Spring 2021	2033
MS-2-150-454-C52K	3	PSA	Spring 2021	2033
MS-2-150-453-C52K	1	PSA	Spring 2021	2033
MS-2-150-448-C52K	3	PSA	Spring 2021	2033
MS-2-150-427-C52K	1	PSA	Spring 2021	2033
MS-2-074-414-C52K	1	PSA	Spring 2021	2033
MS-2-074-407-C52K	1	PSA	Spring 2021	2033
MS-2-074-406-C52K	1	PSA	Spring 2021	2033
MS-2-074-404-C52K	1	PSA	Spring 2021	2033
MS-2-074-403-C52KA	1	PSA	Spring 2021	2033
MS-2-074-403-C52K	1	PSA	Spring 2021	2033
MS-2-074-401-C52K	1	PSA	Spring 2021	2033
MS-2-073-703-S55K	3	PSA	Spring 2021	2033
MS-2-073-417-C52K	1	PSA	Spring 2021	2033
MS-2-073-406-C52K	1	PSA	Spring 2021	2033
MS-2-028-422-S33K	1L	PSA	Spring 2021	2033
MS-2-026-700-S75K	3	PSA	Spring 2021	2033
MS-2-026-406-S75K	3	PSA	Spring 2021	2033
MS-2-025-700-S75K	3	PSA	Spring 2021	2033
MS-2-025-406-S75K	1	PSA	Spring 2021	2033
MS-2-004-409-C72KA	35	PSA	Spring 2021	2033
MS-2-004-409-C72K	35	PSA	Spring 2021	2033

MS-2-004-408-C72K	35	PSA	Spring 2021	2033
MS-2-004-407-C72KA	35	PSA	Spring 2021	2033
MS-2-004-407-C72K	35	PSA	Spring 2021	2033
MS-2-004-406-C72K	100	PSA	Spring 2021	2033
MS-2-004-405-C72KA	35	PSA	Spring 2021	2033
MS-2-004-405-C72K	35	PSA	Spring 2021	2033
MS-2-004-404-C72K	35	PSA	Spring 2021	2033
MS-2-003-412-C72K	100	PSA	Spring 2021	2033
MS-2-003-411-C72K	100	PSA	Spring 2021	2033
MS-2-003-410-C72KA	100	PSA	Spring 2021	2033
MS-2-003-410-C72K	100	PSA	Spring 2021	2033
MS-2-003-409-C72KA	100	PSA	Spring 2021	2033
MS-2-003-409-C72K	100	PSA	Spring 2021	2033
MS-2-003-407-C72KA	100	PSA	Spring 2021	2033
MS-2-003-407-C72K	100	PSA	Spring 2021	2033
MS-2-003-406-C72K	35	PSA	Spring 2021	2033
MS-2-003-405-C72K	35	PSA	Spring 2021	2033
MS-2-002-700-C72K	100	PSA	Spring 2021	2033
MS-2-002-411-C72KA	35	PSA	Spring 2021	2033
MS-2-002-411-C72K	35	PSA	Spring 2021	2033
MS-2-002-408-C72KA	35	PSA	Spring 2021	2033
MS-2-002-408-C72K	35	PSA	Spring 2021	2033
MS-2-002-405-C72K	100	PSA	Spring 2021	2033
MS-2-002-404-C72KA	35	PSA	Spring 2021	2033
MS-2-002-404-C72K	35	PSA	Spring 2021	2033
MS-2-001-407-C72K	100	PSA	Spring 2021	2033
MS-2-001-406-C72K	100	PSA	Spring 2021	2033
MS-2-001-405-C72K	35	PSA	Spring 2021	2033
MS-2-001-404-C72K	100	PSA	Spring 2021	2033
FW-2-SB-034-008-2	1/2	PSA	Spring 2021	2033
FW-2-SB-034-003-2	1/2	PSA	Spring 2021	2033
FW-2-SB-033-008-2	1/4	PSA	Spring 2021	2033
FW-2-SB-033-003-2	1/4	PSA	Spring 2021	2033
FW-2-106-414-S65K	3	PSA	Spring 2021	2033
FW-2-106-413-S62K	3	PSA	Spring 2021	2033
FW-2-106-403-S62K	3	PSA	Spring 2021	2033
FW-2-105-413-S65K	3	PSA	Spring 2021	2033
FW-2-105-408-S62K	1	PSA	Spring 2021	2033
FW-2-105-402-S62K	1	PSA	Spring 2021	2033
FW-2-104-411-S62K	3	PSA	Spring 2021	2033
FW-2-104-406-S65K	3	PSA	Spring 2021	2033
FW-2-104-401-S62K	3	PSA	Spring 2021	2033
FW-2-103-415-S65K	3	PSA	Spring 2021	2033
FW-2-103-413-S62K	3	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

FW-2-103-403-S62K	1	PSA	Spring 2021	2033
FW-2-102-702-C62K	10	PSA	Spring 2021	2033
FW-2-099-703-C62K	10	PSA	Spring 2021	2033
FW-2-099-700-C62K	10	PSA	Spring 2021	2033
FW-2-099-402-C62K	10	PSA	Spring 2021	2033
FW-2-098-704-C62KA	3	PSA	Spring 2021	2033
FW-2-098-419-S62K	10	PSA	Spring 2021	2033
FW-2-097-451-C52K	10	PSA	Spring 2021	2033
FW-2-097-448-C62K	10	PSA	Spring 2021	2033
FW-2-097-403-S62K	10	PSA	Spring 2021	2033
FW-2-096-716-C62K	10	PSA	Spring 2021	2033
FW-2-096-713-C62K	10	PSA	Spring 2021	2033
FW-2-096-710-C62K	10	PSA	Spring 2021	2033
FW-2-096-708-C62K	10	PSA	Spring 2021	2033
FW-2-096-705-C62KA	10	PSA	Spring 2021	2033
FW-2-096-705-C62K	10	PSA	Spring 2021	2033
FW-2-096-702-C62KA	10	PSA	Spring 2021	2033
FW-2-096-702-C62K	10	PSA	Spring 2021	2033
FW-2-096-444-S62K	10	PSA	Spring 2021	2033
FW-2-096-409-C62K	3	PSA	Spring 2021	2033
FW-2-096-403-C62K	10	PSA	Spring 2021	2033
FW-2-096-402-C62K	10	PSA	Spring 2021	2033
FW-2-095-705-C62K	10	PSA	Spring 2021	2033
FW-2-095-402-S62K	10	PSA	Spring 2021	2033
FW-2-094-403-S65K	3	PSA	Spring 2021	2033
FW-2-093-701-S65K	3	PSA	Spring 2021	2033
FW-2-092-404-S65K	3	PSA	Spring 2021	2033
FW-2-091-700-S65K	3	PSA	Spring 2021	2033
FW-2-020-407-C52K	100	PSA	Spring 2021	2033
FW-2-019-405-C52KA	35	PSA	Spring 2021	2033
FW-2-019-405-C52K	35	PSA	Spring 2021	2033
FW-2-019-404-C42KA	100	PSA	Spring 2021	2033
FW-2-018-458-C42KA	35	PSA	Spring 2021	2033
FW-2-018-448-C72KA	35	PSA	Spring 2021	2033
FW-2-018-448-C72K	35	PSA	Spring 2021	2033
FW-2-017-454-C52KA	100	PSA	Spring 2021	2033
FW-2-017-454-C52K	100	PSA	Spring 2021	2033
FW-2-017-444-C72KA	100	PSA	Spring 2021	2033
FW-2-017-444-C72K	100	PSA	Spring 2021	2033
DO-2-071-408-D63KA	10	PSA	Spring 2021	2033
DO-2-071-408-D63K	10	PSA	Spring 2021	2033
DO-2-071-405-D63KA	35	PSA	Spring 2021	2033
DO-2-071-405-D63K	35	PSA	Spring 2021	2033
DO-2-071-402-D53K	35	PSA	Spring 2021	2033

DO-2-070-700-D53K	35	PSA	Spring 2021	2033
DO-2-070-403-D53KA	10	PSA	Spring 2021	2033
DO-2-070-403-D53K	10	PSA	Spring 2021	2033
DO-2-058-700-D53K	3	PSA	Spring 2021	2033
DO-2-058-403-D53KA	10	PSA	Spring 2021	2033
DO-2-058-403-D53K	10	PSA	Spring 2021	2033
DO-2-038-408-D63KA	35	PSA	Spring 2021	2033
DO-2-038-408-D63K	35	PSA	Spring 2021	2033
DO-2-038-405-D63KA	35	PSA	Spring 2021	2033
DO-2-038-405-D63K	35	PSA	Spring 2021	2033
DO-2-038-402-D53K	35	PSA	Spring 2021	2033
DO-2-033-700-D53K	10	PSA	Spring 2021	2033
DO-2-033-403-D53KA	10	PSA	Spring 2021	2033
DO-2-033-403-D53K	10	PSA	Spring 2021	2033
DO-2-029-403-D53KA	10	PSA	Spring 2021	2033
DO-2-029-403-D53K	10	PSA	Spring 2021	2033
CT-2-125-403-C72K	10	PSA	Spring 2021	2033
CT-2-117-414-C62K	1	PSA	Spring 2021	2033
CT-2-117-412-C62KA	1	PSA	Spring 2021	2033
CT-2-117-412-C62K	1	PSA	Spring 2021	2033
CT-2-083-420-S32K	3	PSA	Spring 2021	2033
CT-2-076-408-C82KA	3	PSA	Spring 2021	2033
CT-2-076-408-C82K	3	PSA	Spring 2021	2033
CT-2-076-404-C82KA	3	PSA	Spring 2021	2033
CT-2-076-404-C82K	3	PSA	Spring 2021	2033
CT-2-051-418-C72KA	10	PSA	Spring 2021	2033
CT-2-051-418-C72K	10	PSA	Spring 2021	2033
CT-2-051-410-C72KA	1	PSA	Spring 2021	2033
CT-2-051-410-C72K	1	PSA	Spring 2021	2033
CT-2-051-408-C72KA	3	PSA	Spring 2021	2033
CT-2-051-408-C72K	3	PSA	Spring 2021	2033
CT-2-051-406-C72KA	3	PSA	Spring 2021	2033
CT-2-051-406-C72K	3	PSA	Spring 2021	2033
CT-2-049-410-C82KA	1	PSA	Spring 2021	2033
CT-2-049-410-C82K	1	PSA	Spring 2021	2033
CT-2-049-404-C82KA	3	PSA	Spring 2021	2033
CT-2-049-404-C82K	3	PSA	Spring 2021	2033
CT-2-049-009-C82K	1	PSA	Spring 2021	2033
CT-2-048-042-C82K	1	PSA	Spring 2021	2033
CT-2-046-017-C82K	1	PSA	Spring 2021	2033
CT-2-046-015-C92KA	3	PSA	Spring 2021	2033
CT-2-046-015-C92K	3	PSA	Spring 2021	2033
CT-2-044-020-C92KA	3	PSA	Spring 2021	2033
CT-2-044-020-C92K	3	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

CT-2-044-017-C82K	1	PSA	Spring 2021	2033
CT-2-034-415-C82K	3	PSA	Spring 2021	2033
CT-2-034-009-C82K	1	PSA	Spring 2021	2033
CT-2-033-043-C82K	3	PSA	Spring 2021	2033
CT-2-031-018-C92KA	3	PSA	Spring 2021	2033
CT-2-031-018-C92K	3	PSA	Spring 2021	2033
CT-2-029-020-C82K	1	PSA	Spring 2021	2033
CT-2-025-406-S32K	10	PSA	Spring 2021	2033
CT-2-025-405-S22K	10	PSA	Spring 2021	2033
CT-2-024-408-S22K	3	PSA	Spring 2021	2033
CT-2-024-407-S22K	10	PSA	Spring 2021	2033
CT-2-017-447-S32KA	10	PSA	Spring 2021	2033
CT-2-017-447-S32K	10	PSA	Spring 2021	2033
CT-2-014-445-S22K	10	PSA	Spring 2021	2033
CT-2-014-439-C72KA	10	PSA	Spring 2021	2033
CT-2-014-439-C72K	10	PSA	Spring 2021	2033
CT-2-014-433-C82K	3	PSA	Spring 2021	2033
CT-2-014-432-C82KA	3	PSA	Spring 2021	2033
CT-2-014-432-C82K	3	PSA	Spring 2021	2033
CT-2-014-429-C52KA	10	PSA	Spring 2021	2033
CT-2-014-429-C52K	10	PSA	Spring 2021	2033
CT-2-014-425-C82K	10	PSA	Spring 2021	2033
CT-2-013-444-C82KA	3	PSA	Spring 2021	2033
CT-2-013-444-C82K	3	PSA	Spring 2021	2033
CT-2-013-441-C62KA	10	PSA	Spring 2021	2033
CT-2-013-441-C62K	10	PSA	Spring 2021	2033
CT-2-013-440-C82KA	3	PSA	Spring 2021	2033
CT-2-013-440-C82K	3	PSA	Spring 2021	2033
CT-2-013-429-C52KA	3	PSA	Spring 2021	2033
CT-2-013-429-C52K	3	PSA	Spring 2021	2033
CT-2-013-421-S22K	10	PSA	Spring 2021	2033
CT-2-013-408-S42KA	10	PSA	Spring 2021	2033
CT-2-013-408-S42K	10	PSA	Spring 2021	2033
CT-2-013-407-S42K	35	PSA	Spring 2021	2033
CT-2-012-409-S22KA	3	PSA	Spring 2021	2033
CT-2-012-409-S22K	3	PSA	Spring 2021	2033
CT-2-011-700-S22KA	3	PSA	Spring 2021	2033
CT-2-011-700-S22K	3	PSA	Spring 2021	2033
CT-2-011-409-S22K	3	PSA	Spring 2021	2033
CT-2-011-405-S22K	3	PSA	Spring 2021	2033
CT-2-010-411-S22K	3	PSA	Spring 2021	2033
CT-2-009-409-S22K	3	PSA	Spring 2021	2033
CT-2-009-404-S22KA	3	PSA	Spring 2021	2033
CT-2-009-404-S22K	3	PSA	Spring 2021	2033

CT-2-006-700-S22K	3	PSA	Spring 2021	2033
CT-2-006-404-S22K	10	PSA	Spring 2021	2033
CT-2-006-402-S22K	10	PSA	Spring 2021	2033
CT-2-005-406-S22K	3	PSA	Spring 2021	2033
CT-2-005-404-S22K	3	PSA	Spring 2021	2033
CT-2-005-403-S22KA	3	PSA	Spring 2021	2033
CT-2-005-403-S22K	3	PSA	Spring 2021	2033
CT-2-002-402-S22KA	3	PSA	Spring 2021	2033
CT-2-002-402-S22K	3	PSA	Spring 2021	2033
CS-2-SB-100-001-5A	1/2	PSA	Spring 2021	2033
CS-2-SB-100-001-5	1/2	PSA	Spring 2021	2033
CS-2-SB-081-004-2	1/4	PSA	Spring 2021	2033
CS-2-RB-080-704-2	1/4	PSA	Spring 2021	2033
CS-2-RB-080-703-2	1/4	PSA	Spring 2021	2033
CS-2-RB-080-701-2	1/4	PSA	Spring 2021	2033
CS-2-RB-061-706-5	1/2	PSA	Spring 2021	2033
CS-2-RB-061-702-1	1/4	PSA	Spring 2021	2033
CS-2-RB-052-706-5	1/2	PSA	Spring 2021	2033
CS-2-RB-051-710-1A	1	PSA	Spring 2021	2033
CS-2-RB-051-708-1A	1	PSA	Spring 2021	2033
CS-2-RB-045-003-2	1/2	PSA	Spring 2021	2033
CS-2-RB-045-002-5B	1/2	PSA	Spring 2021	2033
CS-2-RB-045-002-5A	1/2	PSA	Spring 2021	2033
CS-2-RB-045-002-5	1/2	PSA	Spring 2021	2033
CS-2-RB-043-002-5B	1/2	PSA	Spring 2021	2033
CS-2-RB-043-002-5A	1/2	PSA	Spring 2021	2033
CS-2-RB-043-002-5	1/2	PSA	Spring 2021	2033
CS-2-RB-037A-703-1A	1/4	PSA	Spring 2021	2033
CS-2-RB-032-003-2	1/2	PSA	Spring 2021	2033
CS-2-RB-032-002-5B	1/2	PSA	Spring 2021	2033
CS-2-RB-032-002-5A	1/2	PSA	Spring 2021	2033
CS-2-RB-032-002-5	1/2	PSA	Spring 2021	2033
CS-2-RB-030B-705-2	1	PSA	Spring 2021	2033
CS-2-RB-022-705-2	1/4	PSA	Spring 2021	2033
CS-2-RB-022-701-2	1	PSA	Spring 2021	2033
CS-2-RB-021-718-1	1/2	PSA	Spring 2021	2033
CS-2-RB-021-714-1	1/2	PSA	Spring 2021	2033
CS-2-RB-012-706-2	1/4	PSA	Spring 2021	2033
CS-2-RB-011-712-2	1/2	PSA	Spring 2021	2033
CS-2-RB-011-704-2	1/2	PSA	Spring 2021	2033
CS-2-RB-001-711-2	1/4	PSA	Spring 2021	2033
CS-2-RB-001-707-2	1/2	PSA	Spring 2021	2033
CS-2-AB-071-011-5A	1/4	PSA	Spring 2021	2033
CS-2-AB-071-011-5	1/4	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

CS-2-AB-071-009-5A	1/4	PSA	Spring 2021	2033
CS-2-AB-071-009-5	1/4	PSA	Spring 2021	2033
CS-2-AB-071-004-2A	1/4	PSA	Spring 2021	2033
CS-2-AB-071-004-2	1/4	PSA	Spring 2021	2033
CS-2-AB-067-017-3	1/4	PSA	Spring 2021	2033
CS-2-AB-002B-004-3	1/4	PSA	Spring 2021	2033
CS-2-AB-002B-003-3	1/4	PSA	Spring 2021	2033
CS-2-913-700-S55K	1	PSA	Spring 2021	2033
CS-2-906-432-S42K	1/2	PSA	Spring 2021	2033
CS-2-628-402-A42K	1/4	PSA	Spring 2021	2033
CS-2-358-001-A53K	1	PSA	Spring 2021	2033
CS-2-344-401-A42K	1	PSA	Spring 2021	2033
CS-2-242-710-A42KA	1	PSA	Spring 2021	2033
CS-2-242-710-A42K	1	PSA	Spring 2021	2033
CS-2-240-405-A42K	3	PSA	Spring 2021	2033
CS-2-240-403-A42K	1	PSA	Spring 2021	2033
CS-2-239-405-A42K	3	PSA	Spring 2021	2033
CS-2-239-403-A42K	1	PSA	Spring 2021	2033
CS-2-085-407-A42K	1/2	PSA	Spring 2021	2033
CS-2-085-404-A42K	3	PSA	Spring 2021	2033
CS-2-079-432-C42KA	1	PSA	Spring 2021	2033
CS-2-079-432-C42K	1	PSA	Spring 2021	2033
CS-2-079-431-C42K	1/4	PSA	Spring 2021	2033
CS-2-079-422-C42KA	1	PSA	Spring 2021	2033
CS-2-079-422-C42K	1	PSA	Spring 2021	2033
CS-2-079-421-C42K	1/2	PSA	Spring 2021	2033
CS-2-078-410-C42K	1	PSA	Spring 2021	2033
CS-2-078-409-C42K	1/2	PSA	Spring 2021	2033
CS-2-078-407-C42K	1	PSA	Spring 2021	2033
CS-2-063-430-S22K	3	PSA	Spring 2021	2033
CS-2-063-427-S22K	3	PSA	Spring 2021	2033
CS-2-063-414-S42K	10	PSA	Spring 2021	2033
CS-2-063-405-S22K	3	PSA	Spring 2021	2033
CS-2-027-700-A53K	1/2	PSA	Spring 2021	2033
CS-2-026-700-A53K	1/2	PSA	Spring 2021	2033
CS-2-012-701-C42K	1/2	PSA	Spring 2021	2033
CS-2-002-402-C42K	1	PSA	Spring 2021	2033
CS-2-001-410-C42K	1	PSA	Spring 2021	2033
CS-2-001-409-C42K	1	PSA	Spring 2021	2033
CS-2-001-406-C42K	1	PSA	Spring 2021	2033
CC-2-RB-073-001-3	1/2	PSA	Spring 2021	2033
CC-2-RB-072-005-3	1/2	PSA	Spring 2021	2033
CC-2-RB-039-001-3	1	PSA	Spring 2021	2033
CC-2-RB-002-002-5	1/4	PSA	Spring 2021	2033

CC-2-164-407-A63K	10	PSA	Spring 2021	2033
CC-2-158-408-A43KA	10	PSA	Spring 2021	2033
CC-2-158-408-A43K	10	PSA	Spring 2021	2033
CC-2-158-407-A43KA	3	PSA	Spring 2021	2033
CC-2-158-407-A43K	3	PSA	Spring 2021	2033
CC-2-126-004-F43K	3	PSA	Spring 2021	2033
CC-2-110-703-A43K	10	PSA	Spring 2021	2033
CC-2-087-700-A33K	35	PSA	Spring 2021	2033
CC-2-078-410-S43K	10	PSA	Spring 2021	2033
CC-2-077-405-S43K	10	PSA	Spring 2021	2033
CC-2-066-409-S23K	10	PSA	Spring 2021	2033
CC-2-066-407-S23K	10	PSA	Spring 2021	2033
CC-2-066-401-S33K	10	PSA	Spring 2021	2033
CC-2-065-409-S43K	3	PSA	Spring 2021	2033
CC-2-057-701-A33K	10	PSA	Spring 2021	2033
CC-2-050-702-A43K	10	PSA	Spring 2021	2033
CC-2-046-704-A43K	35	PSA	Spring 2021	2033
CC-2-046-702-A43K	35	PSA	Spring 2021	2033
CC-2-044-700-A43KA	35	PSA	Spring 2021	2033
CC-2-044-700-A43K	35	PSA	Spring 2021	2033
CC-2-043-714-A33K	35	PSA	Spring 2021	2033
CC-2-043-705-A33K	35	PSA	Spring 2021	2033
CC-2-043-704-A33K	35	PSA	Spring 2021	2033
CC-2-042-700-A75K	1	PSA	Spring 2021	2033
CC-2-033-406-S33K	10	PSA	Spring 2021	2033
CC-2-031-405-S43K	10	PSA	Spring 2021	2033
CC-2-031-401-S33K	10	PSA	Spring 2021	2033
CC-2-030-403-S33K	35	PSA	Spring 2021	2033
CC-2-028-411-S33KA	35	PSA	Spring 2021	2033
CC-2-028-411-S33K	35	PSA	Spring 2021	2033
CC-2-019-716-A43K	3	PSA	Spring 2021	2033
CC-2-019-715-A43K	35	PSA	Spring 2021	2033
CC-2-019-714-A43K	10	PSA	Spring 2021	2033
CC-2-019-702-A43K	3	PSA	Spring 2021	2033
CC-2-015-700-A43KA	35	PSA	Spring 2021	2033
CC-2-015-700-A43K	35	PSA	Spring 2021	2033
CC-2-012-702-A43K	10	PSA	Spring 2021	2033
CC-2-012-700-A43K	10	PSA	Spring 2021	2033
CC-2-008-703-A43K	35	PSA	Spring 2021	2033
CC-2-007-020-A43K	3	PSA	Spring 2021	2033
CC-2-007-001-A73K	1	PSA	Spring 2021	2033
AF-2-102-416-S33K	3	PSA	Spring 2021	2033

Table 1-Snubber visual deferrals

Legend				
Note 1: Previous visual examination Spring 2011 - All Satisfactory				
PME = Paul Monroe Hydraulic snubber				
PSA = Basic PSA mechanical snubber				