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JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR SERVICES

SEP 15 1988

Docket Nos: 50-277
50-278

Mr. C. E. Rossi, Director
Division of Operational Events Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station (PBAPS) Units 2 & 3
NRC Bulletin 88-05, dated May 6, 1988
"Nonconforming Material Supplied by
Piping Supplies, Inc. at Folsom
New Jersey and West Jersey Manufacturing
Company at Williamstown, New Jersey"
Supplement 1 to Bulletin 88-05, dated
June 15, 1988
Supplement 2 to Bulletin 88-05, dated
August 3, 1988

Dear Mr. Rossi:

The subject NRC Bulletin, received by Philadelphia Electric Company (PECo) on May 18, 1988, and Supplements 1 and 2, received on June 22, 1988, and August 5, 1988 respectively, require holders of operating licenses to provide a written response within 120 days of receipt of the Bulletin.

The original Bulletin instructed licensees to: review purchasing records for suspect materials, assure that materials comply with applicable codes, or are suitable for their intended service, or replace such material.

Subsequently, Supplement 1 reduced the scope of the review, established time frames for the testing program, and imposed additional reporting requirements.

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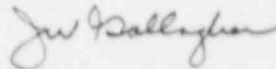
Supplement 2 temporarily suspended activities such as: document review, in-situ testing, and development of justifications for continued operation (JCO's) until further notice.

The enclosed report comprises our complete response to the specific actions delineated by Bulletin 88-05 and the subsequent supplements. The report summarizes the document review, testing and analytical phases of the 88-05 program, specifies the various actions undertaken and to be undertaken during each phase, and compiles the results of the document review performed prior to the receipt of Supplement 2.

Although the record review was in progress, we did not begin the testing phase prior to the receipt of Supplement 2. Like many other plants of the early 1970 vintage, PBAPS was designed and installed to R31.1/31.7 Code. The B31.1/31.7 Code does not have the stringent traceability and tracking programs currently required by the ASME Code. This hindered record search and delayed the implementation of the testing program. Attachment 1 to the report contains the results of the documentation review.

If you have questions or require additional information regarding our NRC Bulletin 88-05 program, please do not hesitate to contact us.

Sincerely,



SAT/vvg/09128801

Enclosure: Report

Copy to: Addressee

W. T. Russell, Region I Administrator

T. P. Johnson, US NRC Senior Resident Inspector

T. E. Magette, State of Maryland

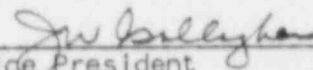
COMMONWEALTH OF PENNSYLVANIA

COUNTY OF PHILADELPHIA

SS.

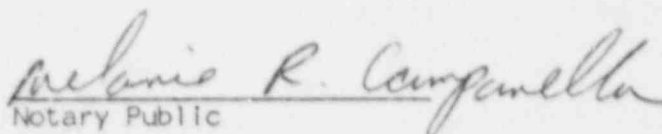
J. W. Gallagher, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the foregoing response to NRC Bulletin 88-05 and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



Vice President

Subscribe and sworn to
Before me this 15th day
of September, 1988.



Notary Public

MELANIE R. CAMPANELLA
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 12, 1990

PEACH BOTTOM ATOMIC POWER STATION (PBAPS)

UNIT 2 & 3

RESPONSE TO NRC BULLETIN 88-05

DOCKET NO. 50-277
50-278

SEPTEMBER 2, 1988

REV. 0

PEACH BOTTOM ATOMIC POWER STATION UNITS 2 & 3

RESPONSE TO NRC BULLETIN 88-05

PURPOSE:

This report provides a complete response to the requirements set forth by NRC Bulletin 88-05 and Supplements 1 and 2 to the Bulletin. The Bulletin 88-05 required licensees to review purchasing records to determine presence of materials supplied by Piping Supplies, Inc. (PSI) and West Jersey Manufacturing Company (WJM), provide assurance that PSI and WJM supplied materials meet the applicable codes and specification requirements or are suitable for their intended service, or replace unsuitable materials.

This report is intended to fully satisfy the 120-day written response reporting requirements of NRC Bulletin 88-05 as modified by Supplements 1 & 2.

SUMMARY:

In response to the Bulletin and Supplements 1 and 2 requirements, Philadelphia Electric Company (PECO), in accordance with Nuclear Management and Resources Council (NUMARC) guidelines, developed a three-phased program for Peach Bottom Atomic Power Station (PBAPS) Units 2 & 3.

During Phase I of the program, PECO conducted an extensive review of purchase records for PBAPS Units 2 & 3 to determine presence of material supplied by PSI and WJM. We have concluded that suspect material has been received at PBAPS Units 2 & 3. Upon discovery of suspect material, those components determined to be in the warehouse were immediately segregated and placed on hold. Those components determined to be installed and accessible in safety-related systems were to be tested in accordance with the Testing Program (Phase II) developed under NUMARC guidelines. However, Supplement 2 suspended in-situ testing before testing could begin for suspect material identified as installed and accessible in safety-related systems.

Attachment I to this Report summarizes the results of the document review conducted until August 5, 1988. It contains the material database formatted by NUMARC in response to the Bulletin reporting requirements.

SUMMARY DESCRIPTION OF PBAPS UNITS 2 & 3 NRC BULLETIN 88-05 PROGRAM:

The Peach Bottom Atomic Power Station Units 2 & 3 NRC Bulletin 88-05 Program is a three-phase program which addresses the following:

- | | |
|------------|---|
| Phase I: | Documentation Review |
| Phase II: | Testing |
| Phase III: | Analysis of Test Results and
Development of Justification for
Continued Operation (JCO's) |

DOCUMENTATION REVIEW:

- (1) Review purchasing records for material purchase of PSI and WJM manufactured/supplied fittings and flanges.
- (2) Review maintenance request forms (MRF) for purchase of PSI/WJM material.
- (3) Review modification packages (Mod) for use or purchase of PSI/WJM material.
- (4) Review Receipt Inspection and Storage Reports (RISR) for PSI/WJM material.
- (5) Determine installation status (i.e., location, accessibility, etc.,) via a review of Mod packages, spool installation records and other pertinent installation documentation.

TESTING PROGRAM:

- (1) Develop site specific in-situ testing guidelines in accordance with NUMARC developed guidelines.
- (2) Conduct testing of accessible safety-related suspect material.

ANALYSIS & JCO's:

- (1) Analyze results of testing to determine acceptability of component.
- (2) Write qualitative JCO's for those components that have failed or have been determined to be inaccessible.

The program was developed and monitored in accordance with existing internal PECO procedures and guidelines established by NUMARC for Bulletin 88-05.

The following discusses how the program satisfies the required action items to be undertaken by the licensee. To assure clarity, the requested actions are restated below along with PECO response to each of these items.

RESPONSE TO BULLETIN & SUPPLEMENTS 1 AND 2 REQUIREMENTS:

(1) Action Requested

Review purchasing records to determine whether any PSI or WJM supplied ASME Code or ASTM material has been furnished. Supplement 1 reduced the scope from "materials" to "fittings and flanges". Supplement 2 identified another affiliated company, Chews Landing Metal Manufacturers Incorporated (CLM) who may have supplied suspect materials.

PECo Response

- (1) PECO was in the process of reviewing purchasing records for fittings and flanges which may have been purchased from PSI and WJM upon receipt of Supplement 2. The results of the partial review were incorporated into the material database established by NUMARC. Attachment I provides the results of the document review.

Phase I of the PBAPS Units 2 & 3 Bulletin 88-05 Program provides the documentation review. Since Peach Bottom is designed and installed to the B31.1/31.7 Code, we encountered several impediments associated with traceability of the material. However, a procedure was developed which addresses the various means by which PSI and WJM material may have been procured for use at PBAPS. The documentation review was divided into the following three (3) categories:

- A) Review of Purchase Orders
- B) Review of Modification (Mod) packages and Maintenance Request Forms (MRF's)
- C) Skid Mounted Components and Secondary Suppliers

The review, thus far, has identified 267 components that were purchased for Peach Bottom Atomic Power Station Units 2 and 3 during the time frame (1976 to present) established by the bulletin. NUMARC, acting on behalf of the Industry, coordinated the review for skid mounted components or those supplied by secondary suppliers. Recently, NUMARC provided the list of secondary suppliers and components purchased to affected utilities. However, we have temporarily suspended the documentation review until further notice from the NRC.

(2) Action Requested

For ASME Code and ASTM materials furnished by PSI or WJM that are either not yet installed in safety-related systems at your facility or are installed in safety-related systems of plants under construction, the following actions are requested: (perform action a and either action b or c).

- a. Provide a list of WJM and PSI supplied materials that are found not to be in conformance with the applicable code requirements or procurement specifications and identify the applications in which these materials are used or will be used. Include the material specification, the nature of the component (e.g., pipe flange), size and pressure rating; also indicate the chain of purchase, and either,
 - b. Take actions that provide assurance that all received materials comply with ASME Code Section III, ASTM, and applicable procurement specification requirements, or that demonstrate that such materials are suitable for the intended service. For example, this program should include specific verification that austenitic stainless steels have been received in a non-sensitized condition, or,
 - c. Replace all questionable fittings and flanges with materials that have been manufactured in full compliance with ASME Code Section III, ASTM, and the applicable procurement specification requirements.

Supplement 1 reduced the scope of the review from "materials" to "fittings and flanges".

PECo Response

- 2a. PECO is a participating member of the NUMARC 88-03 Program. The NUMARC program established the scope of the documentation review, determined testing priorities for operating plants, and issued acceptance criteria for testing to be used by the industry to comply with the Bulletin's requirements.

NUMARC developed a generic format for the material database to be used by all member utilities. The database includes several fields designating material specification, nature of component, size, pressure rating and chain of purchase.

Attachment I contains the results of our documentation review conducted until August 5, 1988.

- 2b. In accordance with NUMARC guidelines, we have developed a well defined, quality assured, testing program to demonstrate conformance of suspect material to applicable codes or to determine acceptability of the suspect material. In addition to the generic material database, NUMARC also created a generic testing database for industry use.

Several guidelines established by NUMARC and accepted by the NRC include:

- Use of the Equotip Hardness Tester for in-situ hardness testing of flanges and fittings.
- For operating plants, field testing priority to be placed on flanges and fittings installed and accessible on safety-related systems.

Supplement 2 temporarily suspended all field activities prior to implementation of our testing program.

- 2c. The actions described in 2b above preclude any replacement of questionable fittings and flanges. Additionally, PECO will not install components which are suspect. A hold was promptly placed on suspect components in the warehouse until further notice from the NRC.

(3) Action Requested

For ASME Code and ASTM materials furnished by WJM or PSI already installed in safety-related systems in operating plants, the following actions are requested:

- a. Provide a list of the WJM and PSI supplied materials that are found not to be in conformance with the applicable code requirements or procurement specifications and identify the applications in which the materials are used. Include the material specification, the nature of the component (e.g., pipe flange), size, and pressure rating; also indicate the chain of purchase.
- b. Take actions requested in 2b or 2c above. However, an evaluation should be undertaken prior to replacing questionable material in accordance with 2c above that considers the occupational radiation exposure that would be received during the replacement process. This evaluation should be considered in developing the method and timing of material replacements.
- c. Document and maintain for inspection a basis for continued plant operation if the program requested in item 3b has not been completed within 120 days of the date of receipt of this bulletin.

Supplement 1 reduced the scope of paragraph 3 of Bulletin 88-05 from ASME and ASTM "materials" to ASME and ASTM "flanges and fittings". For ASME and ASTM flanges and fittings furnished by PSI and WJM already installed in safety-related systems in operating plants, the following actions are requested by Supplement 1:

- a. Commence appropriate testing of accessible flanges and fittings promptly to identify conformance of materials to ASME and ASTM material specifications. Test results for flanges and fittings reported to be from the same heat should be compared for consistency and for conformance to the ASME/ASTM specifications and to values listed on material CMIRs. Any deviation from the specification requires an appropriate analysis justifying continued operation.
- b. If any inaccessible flanges or fittings are identified, an analysis must be performed justifying continued operation.
- c. All other provisions of paragraph 3 of Bulletin 88-05 remain in effect.

Supplement 2 temporarily suspended the above listed activities.

PECo Response

- 3a) As stated in Item 2 above, we have developed a list of suspect materials. The conformance of suspect materials to the applicable material specification was to be determined via the testing program. Thus far, we have developed a well defined, quality assured, testing program for in-situ testing of suspect materials in accordance with existing Internal PECO procedures and generic NUMARC guidelines. Attachment I contains the material data which will be transmitted to NUMARC soon.
- 3b) Due to the difficulties encountered during the record review phase, we have not determined the installation status of the suspect items.

3c) Phase III of the PBAPS 88-05 Program addresses development of justification for continued operation. If JCO's are needed in the future for Bulletin 88-05, we will develop and maintain them for inspection.

(4) Action Requested

For any PSI and WUM supplied materials having suspect CMTRs and used in systems that are not safety-related, take actions commensurate with the function to be performed.

Supplement 1 provides the following further instructions:

For flanges and fittings already identified as having been supplied by PSI or WUM, the actions requested in 3a and 3b above are to be completed within 30 days of receipt of this supplement. For flanges and fittings identified after receipt of this supplement, the actions requested in 3a and 3b above are to be completed within 30 days of identifying the flanges or fittings as being supplied by PSI and WUM.

Supplement 2 temporarily suspended the above listed activities for operating plants.

PECo Response

We did not begin our testing phase because of the difficulties encountered during the documentation review phase. A higher priority on safety-related systems would have precluded any testing on non-safety-related suspect flanges prior to the completion of the safety-related flanges.

(5) Action Requested

Addressees are requested to retain nonconforming materials and maintain for inspection the documentation of the specific actions taken for the identified materials until advised further by the NRC. Nonconforming materials should be segregated to ensure that they are not inadvertently used.

PECo Response

We have segregated and retained the suspect materials as requested above. Documentation pertaining to the specific actions undertaken for the identified materials will be maintained for inspection.

(6) Action Requested

For operating plants, all scheduled actions should be completed before a restart from the next major outage starting after 180 days from the date of receipt of this bulletin. For plants under construction all scheduled actions and the reporting required by 2 below should be completed prior to the planned fuel load date. If any addressee cannot meet this schedule, they should justify to the NRC their proposed alternative schedule.

Supplements 1 & 2 further instruct:

Addressees are encouraged to report the results of tests of PSI and WJM supplied flanges and fittings to the INPO Nuclear Network for dissemination to the industry.

PECo Response

The material database is being transmitted to NUMARC. This report satisfies the required 120 day written response requested by the NRC.

ATTACHMENT I
MATERIAL DATABASE
FOR
PEACH BOTTOM ATOMIC POWER STATION

list plant	line	line	trans	diameter	commodity	rating	type	spec	grade	schedule	best	lot	cntr	dt	quantity	in	stk	institd	acc	vendor	source	supply	l	supply	l	
cord#	plant	line	i	trans	diameter	commodity	rating	type	spec	grade	schedule	best	lot	cntr	dt	quantity	in	stk	institd	acc	vendor	source	supply	l	supply	l
1	PBAPS	C2	A	1.50	FLG	150	EP	105		80	CES	03/27/87	6	5	0	0	0	0	0	0	CANUSO	CANUSO				
2	PBAPS	01	A	1.00	FLG	150	EP	182	F304	40	842	(472423)	03/27/87	6	5	0	0	0	0	0	CANUSO	CANUSO				
3	PBAPS	03	A	1.00	FLG	150	EP	182	F304	40	842	(472423)	09/00/00	6	0	0	0	0	0	0	CANUSO	CANUSO				
4	PBAPS	04	A	8.00	FLG	150	EP, S.O.	105		0	1838		04/11/87	4	0	0	0	0	0	0	CANUSO	CANUSO				
5	PBAPS	05	A	1.00	FLG	150	EP	182	F304	40	47292		05/12/87	4	0	0	0	0	0	0	CANUSO	CANUSO				
6	PBAPS	06	A	1.00	FLG	150	EP	182	F304	40	839		06/18/87	4	0	0	0	0	0	0	CANUSO	CANUSO				
7	PBAPS	07	A	0.75	FLG	150	EP	105		0	AAV-84	(2303)	01/07/85	14	0	0	0	0	0	0	CANUSO	CANUSO				
8	PBAPS	08	A	18.00	FLG	300	EP	105		0	9856		04/23/85	3	0	0	0	0	0	0	CANUSO	CANUSO				
9	PBAPS	09	A	18.00	FLG	300	EP, BL.	105		0	603085		01/21/85	1	0	0	0	0	0	0	CANUSO	CANUSO				
10	PBAPS	10	A	4.00	FLG	150	EP	105		40	CPV	(2385)	01/21/85	8	0	0	0	0	0	0	POLLAKAN	PWR				
11	PBAPS	11	A	8.00	FLG	150	EP	105		40	C-6126		01/21/80	4	0	0	0	0	0	0	CANUSO	CANUSO				
12	PBAPS	12	A	1.50	FLG	150	EP	105		0	COL-25315		06/14/85	10	0	0	0	0	0	0	CANUSO	CANUSO				
13	PBAPS	13	A	0.50	FLG	150	EP	105		0	CBT	(2422)	06/14/85	10	0	0	0	0	0	0	CANUSO	CANUSO				
14	PBAPS	14	A	18.00	FLG	300	EP	105		0	9856		03/21/86	2	0	0	0	0	0	0	CANUSO	CANUSO				
15	PBAPS	15	A	1.00	FLG	150	EP	105		0	50815		05/18/86	4	0	0	0	0	0	0	CANUSO	CANUSO				
16	PBAPS	16	A	1.00	FLG	150	EP	182	F304	40	8334		11/19/86	2	0	0	0	0	0	0	CANUSO	CANUSO				
17	PBAPS	17	A	1.00	FLG	150	EP	125		80	CIW	(3095)	08/29/84	8	0	0	0	0	0	0	CANUSO	CANUSO				
18	PBAPS	18	A	0.75	FLG	150	EP	105		80	CPB	(374E)	05/15/84	32	0	0	0	0	0	0	CANUSO	CANUSO				
19	PBAPS	19	A	4.00	FLG	150	EP, BL	181	1	0	COP	(75065)	06/18/84	2	0	0	0	0	0	0	CANUSO	CANUSO				
20	PBAPS	20	A	2.00	FLG	150	EP, TR	181	1	0	COP	(25315)	05/18/84	1	0	0	0	0	0	0	CANUSO	CANUSO				
21	PBAPS	21	A	3.00	FLG	150	EP, SO	181	1	0	CPW	(533)	05/18/84	1	0	0	0	0	0	0	CANUSO	CANUSO				
22	PBAPS	22	A	2.00	FLG	150	EP, SO	181	1	0	COP	(25315)	06/19/84	1	0	0	0	0	0	0	CANUSO	CANUSO				
23	PBAPS	23	A	20.00	FLG	150	EP	105		0	2506-C		08/14/81	1	0	0	0	0	0	0	CANUSO	CANUSO				
24	PBAPS	24	A	0.75	FLG	150	EP	105		50	AAV-84	(2903)	11/20/84	12	0	0	0	0	0	0	CANUSO	CANUSO				
25	PBAPS	25	A	1.00	FLG	150	EP	105	2	80	A-79		04/22/81	16	0	0	0	0	0	0	CANUSO	CANUSO				
26	PBAPS	26	A	1.00	FLG	150	EP	105	2	80	G00R	(25904)	07/14/82	5	0	0	0	0	0	0	CANUSO	CANUSO				
27	PBAPS	27	A	1.00	FLG	150	EP	105	2	80	GD8L	(886041)	07/14/82	2	0	0	0	0	0	0	CANUSO	CANUSO				
28	PBAPS	28	A	18.00	FLG	150	EP	105		0	4405		01/07/83	2	0	0	0	0	0	0	CANUSO	CANUSO				
29	PBAPS	29	A	14.00	FLG	150	EP	105		0	449626		09/08/83	1	0	0	0	0	0	0	CANUSO	CANUSO				
30	PBAPS	30	A	8.00	FLG	300	EP, BL	105		0	611375		04/18/84	1	0	0	0	0	0	0	CANUSO	CANUSO				
31	PBAPS	31	A	9.00	FLG	300	EP, BL.	105		0	214034		04/18/84	3	0	0	0	0	0	0	CANUSO	CANUSO				
32	PBAPS	32	A	8.00	FLG	300	EP	105		0	NK2C		08/09/83	4	0	0	0	0	0	0	CANUSO	CANUSO				
33	PBAPS	33	A	1.50	FLG	150	EP	105		0	A-1		08/09/83	1	1	0	0	0	0	0	GOLDBER	GOLDBER				
34	PBAPS	34	A	4.50	FLG	150	EP	105		0	G8		08/09/83	23	23	0	0	0	0	0	GOLDBER	GOLDBER				
35	PBAPS	35	A	0.75	FLG	150	EP	105		0	H1		08/09/83	10	12	0	0	0	0	0	GOLDBER	GOLDBER				
36	PBAPS	36	A	2.00	FLG	150	EP	105		0	74270		08/09/83	8	8	0	0	0	0	0	GOLDBER	GOLDBER				
37	PBAPS	37	A	0.75	FLG	150	EP, BL	181	2	0	CI		08/09/83	8	8	0	0	0	0	0	GOLDBER	GOLDBER				
38	PBAPS	38	A	6.00	FLG	900	MIS, BL	105	2	0	A5	(52575)	12/31/75	1	0	0	0	0	0	0	GOLDBER	GOLDBER				
39	PBAPS	39	A	6.00	FLG	900	MIS	105		30	RTPS	(9357)	04/19/82	1	0	0	0	0	0	0	STAND	F.A.S.				
40	PBAPS	40	A	2.00	FLG	600	EP	105		160	D1		08/09/83	4	4	0	0	0	0	0	COPYON	COPYON				
41	PBAPS	41	A	2.00	FLG	0	EP	105		0	74270		08/09/83	10	0	0	0	0	0	0	GOLDBER	GOLDBER			SEE COMMENTS	
42	PBAPS	42	A	1.00	FLG	0	EP	105		6	53596		08/09/83	10	0	0	0	0	0	0	GOLDBER	GOLDBER			SEE COMMENTS	
43	PBAPS	43	A	2.00	FLG	0	EP	105		0	A144		08/09/83	10	0	0	0	0	0	0	GOLDBER	GOLDBER			SEE COMMENTS	

. set print off

. list all

Record#	PLANT	UNIT	LINE_I	TRANS	REMARK
1	PBAPS		02	A	3 sets
2	PBAPS		01	A	3 sets - 1 set returned - 2 sets accepted on R.I.R. dated 5/21/87; 12 found in
3	PBAPS		01	A	G.C. hold area, add'l Heat codes found - B39 & 472892
4	PBAPS		03	A	2 sets - Canuso C of C states Heat Codes of B34
5	PBAPS		05	A	2 sets
6	PBAPS		06	A	2 sets
7	PBAPS		08	A	credit from field = 2; R.I.R. dated 3/17/88; returned 2 to W.J.M. on 2/24/88
8	PBAPS		16	A	2 sets
9	PBAPS		18	A	construction R.I.R. states heat # (XH)
10	PBAPS		19	A	purchased for HPCI GLAND SEAL BLOWER (K-02)
11	PBAPS		20	A	purchased for HPCI GLAND SEAL BLOWER (K-02)
12	PBAPS		21	A	purchased for HPCI GLAND SEAL BLOWER (K-02)
13	PBAPS		22	A	purchased for HPCI GLAND SEAL BLOWER (K-02)
14	PBAPS		24	A	6 sets
15	PBAPS		25	A	8 sets-10 transferred from Limerick
16	PBAPS		26	A	* 6 located in G.C. hold area. Heat code to be verified.
17	PBAPS		27	A	* 6 located in G.C. hold area. Heat code to be verified.
18	PBAPS		32	A	* = No CMTR for item, Heat code from R.I.R.
19	PBAPS		33	A	Non-Q (located in G.C. hold area) No CMTR located
20	PBAPS		34	A	Non-Q (located in G.C. hold area) No CMTR located
21	PBAPS		35	A	Non-Q (located in G.C. hold area) No CMTR located
22	PBAPS		36	A	Non-Q (located in G.C. hold area) No CMTR located
23	PBAPS		37	A	Non-Q (located in G.C. hold area) No CMTR located
24	PBAPS		38	A	MIS=small tongue.
25	PBAPS		39	A	MIS=small tongue.
26	PBAPS		40	A	Non-Q (located in G.C. hold area) No CMTR located
27	PBAPS		41	A	Transferred from Limerick on TR#527, No CMTR located
28	PBAPS		42	A	Transferred from Limerick on TR#527, No CMTR located
29	PBAPS		43	A	Transferred from Limerick on TR#527, No CMTR located
30			01	C	Du=.097
31			03	C	heat treatment at a min. 1925deg.F. Du=.097
32			09	C	Du=.05