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March 20, 1987
Fort St. Vrain
Unit No. 1
P-87117

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 50-267

SUBJECT: FSV Restart and Power Ascension Schedule

REFERENCE: PSC letter, Brey to Berkow, dated 12/12/86 (P-86666)

Gentlemen:

Attached is Public Service Company of Colorado's (PSC) current integrated schedule for Fort St. Vrain (FSV) restart and power ascension activities. The referenced PSC letter submitted a NRC-PSC Restart Interaction Schedule that included a Power Ascension Plan, Item 6, and a Startup Issue Identification and Completion Schedule, Item 9. The FSV Restart and Power Ascension Schedule (Attachment 1) incorporates consolidated schedular information on both of these NRC-PSC interaction activities.

Attachment 1 is a schedule for all of the identified activities that are required for the EQ Completion Certification, Startup/Plant Criticality, and Power Ascension to 82%. Attachment 2 is a brief narrative description of the scope of each line item activity shown on Attachment 1.

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Attachments 1 and 2 represent detailed internal PSC schedular information and are not intended to create, change, or delete previous PSC commitments to the NRC.

Please note that several item numbers have been changed from or added to our previous submittal. (Reference P-87091)

If you have any questions concerning the information provided herein, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,

Lawrence Brey

H. L. Brey, Manager
Nuclear Licensing and Fuels

HLB/EHN/jmt

Attachments

cc: Director of Nuclear Reactor Regulation
ATTN: Mr. H. N. Berkow, Director
Standardization and Special
Projects Directorate

Regional Administrator, Region IV
ATTN: Mr. J. E. Gagliardo, Chief
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ATTACHMENT 2 TO P-87117

FSV RESTART AND POWER ASCENSION SCHEDULE
LINE ITEM DESCRIPTIONS

FSV RESTART AND POWER ASCENSION SCHEDULE
LINE ITEM DESCRIPTIONS

Item 1 — "EQ Outage Work Required for EQ Certification." This item represents plant outage modification and maintenance activities that are required as a result of the EQ program and which must be completed prior to EQ Completion Certification (Item 54). Certain tests and activities may extend beyond the EQ Certification. Any activities that are not completed at the time of Certification would be identified in the EQ Certification letter.

This item is subdivided into four scheduling categories for status-tracking accuracy. The four categories are: CN/CWP work, CCT's/FT's, SSR work, PMT's. These categories are further defined by Items 2, 3, 4, and 5 respectively.

Item 2 — "CN/CWP Work (EQ Certification)" represents that portion of the plant modification work (Change Notice/Controlled Work Procedure) that is required by the EQ program which must be completed prior to EQ Completion Certification (Item 54).

Item 3 — "CCT's/FT's (EQ Certification)" represents the post modification cold checkout testing and functional testing activities (CCT's/FT's) associated with the modification activities of Item 2.

Item 4 — "SSR Work (EQ Certification)" represented that portion of plant preventive and corrective maintenance activities Station Service Request (SSRs) performed on EQ equipment which must be completed prior to EQ Completion Certification (Item 54). (COMPLETE)

Item 5 — "PMT's (EQ Certification)" represents the post maintenance testing activities (PMT's) associated with the maintenance activities of Item 4.

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Item 6 — "EQ Outage Work Required for Startup (Reactor Critical)." This item represents the balance of the plant outage modification and maintenance activities that are required to be complete prior to plant criticality. This activity may include some EQ associated work identified as not having to be complete prior EQ Certification (Item 54).

These activities are start-up related. This item is also subdivided into four scheduling categories for status-tracking accuracy. The four categories are: CN/CWP work, CCT's/FT's, SSR and PMT work, surveillances. These categories are further defined by items 7, 8, 9, and 10, respectively.

Item 7 — "CN/CWP Work (Reactor Criticality)" represents plant modification work (Change Notice/Controlled Work Procedure) on equipment and systems required for reactor criticality (Item 30).

Item 8 — "CCT's/FT's (Reactor Criticality)" represents the post modification cold checkout testing and functional testing activities (CCT's/FT's) associated with the modification activities of Item 7.

Item 9 — "SSR/PMT Work (Reactor Criticality)" represents plant preventive and corrective maintenance activities (SSRs and PMTs) performed on equipment and systems required for reactor criticality (Item 30).

Item 10 — "Surveillances (Reactor Criticality)." This item represents plant surveillance testing activities performed on equipment and systems required for reactor criticality (Item 30).

Item 11 — "EQ Required NCR Closures (NCR Log)." This item includes the identification, generation, disposition and QA approval of non-conforming conditions associated with the EQ related equipment. All EQ related non-conformance reports (NCR's) must be closed-out prior to PSC certifying to the NRC that the EQ program is complete (Item 54).

Item 12 — "Startup NCR Closures (NCR Log)." This item includes the identification, generation, disposition and QA approval of non-conforming conditions that will prohibit plant criticality (Item 30) if not closed out.

FSV RESTART AND POWER ASCENSION SCHEDULE
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Item 13 "Preventive Maintenance Program (First Phase)." This item included the development of PM program controls and implementation of vendor recommended and EQ required preventive maintenance activities. (COMPLETE)

Item 14 "EES Vent Modifications." Development, Training, and Implementation of PM Program.

Item 15 "Steam Generator 6 Inch Vent Design, Material Procurement and Pre-fabrication." This item represented the preparation activities for the 6 inch vent modification (Item 16). This preparation included the planning, design, procurement and pre-fabrication necessary to support the plant 6 inch vent modification activities. (COMPLETE)

Item 16 "EES Vent Installation" represents the period for the installation of the Economizer-Evaporator-Superheater (EES) Section 6 inch vent lines on the main steam line. These plant modifications are required by the Safe Shutdown Cooling Technical Specification change using fire water for cooling.

Item 17 "EES Vent Modification Procedure Revisions and Training." This activity represents the required operating and emergency procedure changes and subsequent training as a result of the EES Vent Modifications."

Item 18 "Firewater/Emergency Feedwater Header Modifications." A test was conducted to determine the time required to install the Firewater Spool Piece on Emergency Feedwater Header (EFH). The EFH System drain time analysis is currently underway. The results of this analysis will determine the final design of system cross-ties.

Item 19 "Firewater/Emergency Feedwater Header Procedures and Training." This item encompasses the preparation of the required operating and emergency procedures and subsequent training as a result of the new emergency Feedwater Header Configuration (Spool Piece Installation).

Item 20 SLRDIS

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Item 21 — "SLRDIS Operator Action Time Walkdown." This activity will be to verify the time required to reestablish forced circulation following actuation of the SLRDIS in order to meet the recovery time specified in the Technical Specifications.

Item 22 — "Surveillance Procedure (PDR) Valve Closure." This activity involves changing procedures governing circulator water turbine valves which must be operated as part of SLRDIS recovery. Changes are based upon vendor's O&M manuals. (COMPLETE)

Item 23 — "SLRDIS Technical Specification Submittal/Review and Approval by NRC" includes the SLRDIS Technical Specification change preparation and submittal to the NRC. This activity also includes the NRC review and approval period. (Reference G-87058, Amendment 50) (COMPLETE)

Item 24 — "Release SLRDIS Emergency Procedures." This item involves the "issue for use" of the Emergency Procedure revisions that were required by SLRDIS. These procedure revisions cannot be "issued for use" until NRC approval of the SLRDIS Technical Specification, but must be issued prior to SLRDIS activation/SPRDS Deactivation (Item 26).

Item 25 — "SLRDIS Design and Construction." This activity includes the plant design and modification activity required to install SLRDIS and the follow-up testing of this system. When this activity is complete along with Items 23 and 24, then SLRDIS can be activated (Item 26).

Item 26 — "SLRDIS Activation/SPRDS Deactivation." This activity involves the activation of SLRDIS and the deactivation of the existing SPRDS. This activity cannot be implemented until Items 22, 23, 24, and 25 are completed.

Item 27 — Plant Operations

Item 28 — "Non-Nuclear Dryout" represents that period when the plant conditions allow for non-nuclear dryout of the core. The duration of this period is dependent upon the moisture level in the core, and plant systems available. Non-nuclear dryout will be accomplished with use of the reheater which will be supplied with steam from the Auxiliary Boiler.

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Item 29 "Preparation for Power Ascension." This item includes the performance of the various activities included in the Overall Plant Operating Procedures) OPOP's applicable to taking the plant critical and increasing power from zero to 82%.

Item 30 "Plant Criticality/Nuclear Dryout/R.O. Training Starts." represents that period of time when plant conditions and regulatory constraints allow for plant criticality and nuclear dryout of the core. The duration of this period is dependent upon the moisture levels in the core, plant systems available and other regulatory constraints. This activity also includes Reactor Operator Training Starts.

Item 31 "Core Performance Testing." This item includes the activities related to verifying reactor core Segment Three design margins and performance characteristics.

Item 32 "Power Ascension to 35%" represents the period of time starting with the 6 inch vent modification completion, and extending through plant operation at an elevated power level based on the existing Safe Shutdown Cooling Technical Specifications. This activity includes operation at a 10% hold point, pending approval from NRC Region IV.

Item 33 "Power Ascension to 82% and Continued Operation" represents the period of time after plant operation at 35% (Item 32) when the plant conditions and regulatory restraints will allow for an elevated plant power level governed by the proposed Safe Shutdown Cooling Technical Specifications.

Item 34 "NCR History Review for EQ Impact." This issue involved the review of closed out Non-Conformance Reports associated with EQ related equipment. This review (EE-EQ-0044) has been completed by the Vendor and has been reviewed by PSC. (COMPLETE)

Item 35 "Complete EQ Procedural Effort." This activity involved the EQ program controls development, revisions and approvals. A system of procedures has been established to implement the ongoing EQ program at FSV in accordance with the upper level administrative controls and guidelines (Item 38). (COMPLETE)

FSV RESTART AND POWER ASCENSION SCHEDULE
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Item 36 "Complete EQ Training Effort (Except Make-up)." This activity involved the EQ training effort necessary to establish the appropriate knowledge level for the personnel that will maintain the EQ program at FSV. (COMPLETE)

Item 37 "Complete Make-up EQ Training." This activity provided make-up classes for those personnel that could not attend the original EQ training courses of Item 36. (COMPLETE)

Item 38 "Final Approval of Level 1 Policy and Procedure G-16." This activity involved the development and approval of the upper tier EQ Policy, Guideline and Program Procedure. These documents define the scope of the EQ program and the system of administrative procedures that implement the EQ program at FSV (Item 35). These documents were submitted to the NRC in the EQ Audit Module Submittal (Item 59). (COMPLETE)

Item 39 "Finalize MEL." This item represented the final design document approvals for establishing the EQ Master Equipment List. The MEL was submitted to the NRC in the EQ Audit Module Submittal (Item 59). (COMPLETE)

Item 40 "Finalize Temperature Profiles - Reactor building." This issue involved the final engineering analysis required for the development and approval of the post HELB environment temperature profiles for the Reactor Building. This analysis was submitted to NRC with PSC letter P-86664, December 12, 1986. (COMPLETE)

Item 41 "Finalize Temperature Profiles - Turbine Building." This issue involved the final engineering analysis required for the development and approval of the post HELB environment temperature profiles for the Turbine Building. This analysis was submitted to NRC with PSC letter P-86673, December 19, 1986. (COMPLETE)

Item 42 "EQ CN Approval Memo's/Follow-up Activities." The Work Review Committee approved CN document packages which required additional follow-up actions by NED. These follow-up actions were documented on memo's from the Station Manager to NED managers. (COMPLETE)

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Item 43 "Final CN/CWP P.O. Reviews." This activity involves the engineering review of purchase order documentation associated with the EQ modification (CN/CWP) activities, to ensure that the purchasing requirements meet the requirements set forth in the EQ binders. (COMPLETE)

Item 44 "QA Review of EQ P.O. Review." QA final review to ensure adequacy of purchasing requirements and specifications for EQ related equipment. Completed to support EQ Certification Letter (Item 54). Four non-EQ Purachse Orders are still under review.

Item 45 "Complete SMAP-27 Binder Reviews (EQ)." This activity includes the maintenance review of the EQ binders, in accordance with SMAP-27, to incorporate the EQ maintenance and surveillance requirements into the plant working procedures. (Complete to support Item 54)

Item 46 "Binder Document Updates and Telecon Resolution." This activity involves the incorporation of document changes to the EQ binders as a result of the third party EQ audit. This activity also includes replacing vendor telecons with letters to the vendor requesting verification of the information in the telecons.

Item 47 "Finalize EQ Binder CN's." This activity includes the final engineering and administrative approval of the EQ Binder Change Notice (CN) documents to incorporate these documents into the controlled design document system. When this activity is finalized, Item 45 can be completed.

Item 48 "Update O & M Library (EQ Related)." This issue involved the controlled vendor manual program developed in response to Generic Letter 83-28 and the implementation of this program for the EQ related vendor manuals. This activity is an input to the EQ Maintenance Review SMAP-27 (Item 45). (COMPLETE)

Item 49 "EQ MCAR Closure." This issue involved the closeout of Management Corrective Action Request 85-001 which was generated by QA as a result of insufficient EQ program controls. This item was resolved and closed out with the completion of Items 50 and 35. (COMPLETE)

FSV RESTART AND POWER ASCENSION SCHEDULE
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Item 50 "Close EQ Related CAR Items." This activity involved the disposition and QA approval of EQ related Corrective Action Requests. This activity consisted of EQ related CARS that were completed before the EQ MCAR 85-001 (Item 49) was closed out and additional EQ CAR items not tied to the MCAR close-out. (COMPLETE)

Item 51 "PSC Audit Prep." This activity represented the final preparation for the NRC EQ Audit, including trial audits, presentation preparation, security clearances and facilities for the NRC inspectors. (COMPLETE)

Item 52 "Resolution of Audit Findings." This activity involves the resolution of any audit findings resulting from the NRC EQ Audit (Item 61). (COMPLETE)

Item 53 "EQ Completion Status Letter." This item was the PSC generated letter which indicated progress/status of the FSV Program Activities. (Reference P-87077, February 25, 1987.) (COMPLETE)

Item 54 "EQ Completion Certification Letter." This item represented the PSC generated letter certifying to the NRC that the FSV EQ program has been implemented and meets the requirements of 10CFR50.49.

Item 55 "SMAP-25 Review/Final SSR Closure." This activity represents the EQ review performed on all EQ related Station Service Requests (SSR's) to ensure that the EQ basis has been maintained during normal maintenance activities. (COMPLETE)

Item 56 "CADS Walkdown Closure." This activity involves the closeout of the EQ walkdown documentation. Maintenance deficiencies were identified during the walkdown generating Corrective Action Data Sheets (CADS) which are closed out when the associated SSR work has been completed.

Item 57 "NRC Issue SER on Profiles." This activity included the NRC review and approval of the post HELB environmental profiles for the Reactor and Turbine Buildings and the development and issuance of the NRC's Safety Evaluation Report on this issue. (Reference G-87071, March 13, 1987) (COMPLETE)

FSV RESTART AND POWER ASCENSION SCHEDULE
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Item 58 "Completion of ED-103 Reviews." This activity involves the engineering review of plant modification Change Notice and Controlled Work Procedure documents to ensure that the EQ basis of equipment has been maintained during the modification activities. ED-103 is the Engineering Design Procedure used to control this activity.

Item 59 "EQ Audit Module Submittal." This item represented the PSC submittal to the NRC of the key EQ program documents necessary for the NRC Audit preparation. This submittal was made prior to the NRC EQ Audit (Item 61) to NRC Region IV at the Arlington, Texas meeting on January 13, 1987. (COMPLETE)

Item 60 "NRC I & E Region IV PEP and Pre EQ Audit Meetings." This item represented the scheduled NRC/PSC meeting at Region IV to discuss the PEP status and EQ Audit preparations. (COMPLETE)

Item 61 "NRC I & E EQ Audit/Findings." This activity represented the NRC EQ Audit held on 1/26/87 and the identification of audit findings to PSC. Audit finding resolutions were initiated on a daily basis upon the identification of any finding. (COMPLETE)

Item 62 "NRC EQ Audit Evaluation and Staff Review." This item represented the NRC activity, post EQ Audit, to assess the FSV EQ program success, and to prepare staff recommendations to the Commission for plant startup. (COMPLETE)

Item 63 "NRC Commissioner's Meeting." The NRC Commissioner's meeting assessed FSV progress to resolve EQ and other regulatory and management issues and to obtain NRC's approval for plant startup. (COMPLETE)

Item 64 "NRC Lag Time Until Permission to Restart is Granted." This item represents the period of time required for any final NRC/PSC interactions and for issuance of documentation of NRC approval of FSV startup.

Item 65 "Power Ascension Schedule Development/Submittal (Rise to Power)." This activity includes the development of the plant's rise to power schedule. This plan has been developed and will be updated on a bi-weekly basis. (COMPLETE)

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Item 66 "Ongoing Activity Plan Development." The ongoing activity plan is a master plan and schedule of the various activities and programs that are being implemented at FSV. These various activities are not a constraint to plant startup.

Item 67 "Safe Shutdown Cooling Flowpath 39% Submittal." This activity included the technical evaluation of power operation that can be supported by the Safe Shutdown Cooling flowpaths and the existing Tech. Specs. Note: this is submitted for NRC information only. (Reference PSC letter P-86682, December, 30, 1986.) (COMPLETE)

Item 68 "Safety Related Equipment Walkdown First Phase, Operability." This item represented the walkdown activity, engineering analysis, and initiation of maintenance activities to address generic maintenance issues that were identified during the EQ walkdown. (COMPLETE)

Item 69 "Safety Related Equipment Walkdown Second Phase, Plan Development." This item included the development of a long term program plan to systematically perform a plant walkdown to verify the as-built condition, name plate data, and identifying possible program and procedure changes to enhance the maintained condition of plant equipment, thereby improving plant operability. (COMPLETE)

Item 70 "Management Change Impact Assessment/NRC Approval." The impact of management position vacancies will be evaluated. Corrective Action will be developed as required. (Reference P-87090, March 5, 1987)

Item 71 "Implement Revised RERP Accountability." This activity includes the staff augmentation of the revised RERP Accountability program. This item is an NRC Commitment to be completed prior to plant startup. (COMPLETE)

Item 72 "Emergency Diesel Generator Near Term Fix (CN-1622F)." This activity involved a design change in the source point of DC control power to the undervoltage protection system on the 480 VAC essential buses, which initiates EDG start upon loss of voltage. The change in the source point was from the DC bus direct to the DC control power automatic throwover scheme in each of 480 VAC switchgear units. (COMPLETE)

FSV RESTART AND POWER ASCENSION SCHEDULE
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Item 73

"EDG Elect. Ind. & DC Control Power Mod Submittal." This activity involves preparing a PSC submittal to the NRC to address the EDG Independence and the DC Control Power Single Failure Issues. The PSC submittal includes an in-depth engineering evaluation on the EDG independence and an assessment of the results. In addition, the submittal contains commitments associated with design changes and tests to resolve short and long term issues on the DC Control Power System. All commitments include a well defined schedule. All of the above items are in response to discussions held with the NRC staff on August 14 and December 9, 1986. (Reference P-87008, dated January 9, 1987.) (COMPLETE)

Item 74

"NRC approval of EDG Power Modification Submittal". This activity involves the NRC review and approval of the submittal identified in Item 73. The key issues requiring approval prior to restart are:

1. Manual capabilities exist to energize the associated 480 VAC essential buses from at least one EDG set for a postulated single failure in the permissive control logic circuitry.

2. Paralleling of the two redundant EDG sets is precluded for a single failure in the permissive control logic circuitry.

3. Demonstrate through testing the operability of DC control power automatic throwover feature in each 480 VAC essential switchgear unit and feeder breaker protective coordination.

A meeting with NRC in Washington, DC was held on February 9, 1987 to discuss schedules and commitments for these items. (Reference G-87078)

Item 75

"Safe Shutdown Cooling With EES Only." This activity involved the reanalysis with reliance upon EES (Economizer-Evaporator-Superheater) sections only to achieve Safe Shutdown Cooling. Note: this submittal is for NRC information only. (Reference PSC letter P-86683, December 30, 1986.) (COMPLETE)

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Item 76 "Reheater Elimination Analysis (Technical Specification)." This activity documented the Safety Analyses and submitted the License amendment request necessary to eliminate the reheaters from the licensing basis at 82% power level to achieve Safe Shutdown Cooling. (P-87002 dated January 15, 1987.) (COMPLETE)

Item 77 "LER 86-021 Corrective Action CN-2424." This CN involves a firewater single failure modification. Three manual valves (one 10-inch and two 4-inch valves) have been installed and leak tested. (COMPLETE)

Item 78 "Review PEP Commitments for Constraints to Startup." This item represented the management improvements and performance enhancements undertaken by PSC (PEP, SALP, TRM, QEP) to emphasize their importance to plant restart and future operations. (COMPLETE)

Item 79 "Review/Revise Emergency Procedure for APP-R." This activity includes review of the existing Emergency Procedure to reflect the Fire Protection paths identified in PSC's Appendix R submittals. Appropriate revision or preparation of new procedures is also included.

Item 80 "Close Start-up Related CAR Items." This activity involves two CARs: 1) 86-105 - Resolution of deficiencies listed in SMAP-1 as a result of EQ walkdown performed October, 1985; and 2) 86-167 - Resolution of retesting required by SMAP-1. (COMPLETE)

Item 81 "Pre-startup Monitoring." This item involves a review of selected areas of plant activities such as testing, TCR's, SSR's, CWP's, procedural updates, training, etc, for the purpose of verifying the completion of activities which may effect startup.

Item 82 "Prepare Breaker Test Auto Throwover Scheme (CN-2529)". This activity is a commitment made by PSC to NRC at the January 13, 1987 Arlington, Texas meeting. This is a subject related to the Emergency Diesel Generator electrical independence activity. (COMPLETE)

Item 83 "Perform Breaker Test Auto Throwover Scheme (CN-2529)."

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Item 84 "Perform Critical Evaluation of SS and SRO." This activity includes all efforts involved with the development and implementation of an evaluation process for Shift Supervisors (SSs) and Senior Reactor Operators (SROs).

Item 85 "I & E Bulletin 86-02 Corrective Action CN-2007." This CN required moving Alternate Cooling Method Transfer Switches to meet Appendix R Separation Criteria. Actual construction work and testing are completed. (COMPLETE)

Item 86 "Complete Licensing Commitment Log Restart Issues (LERs)." This log is comprised of all LERs which must be closed out prior to restart of the plant.

Item 88 "EES Transient Analysis." There are other accidents/transients evaluated in the FSAR which rely on the EES for decay heat removal besides Safe Shutdown Cooling with firewater. This item involves reanalysis of these accidents/transients to verify that the decay heat removal options in the FSAR are adequate for power operation at the 82% power level. The results of these analyses were submitted to the the NRC to support operation at the 82% power level. (Reference P-87053, February 6, 1987.) (COMPLETED)

Item 89 "Wrong Loop Dump Analysis." This item involved reanalysis of the steam generator tube leak with wrong loop dump accident scenario. The reanalyses included all available options for this accident. Documentation of the results of the analyses were submitted to the NRC to support operation at the 82% power level. (Reference P-87053, February 6, 1987.) (COMPLETED)

Item 90 "Prepare and Submit Power Level Commitment Letter." This letter from PSC to NRC requested authorization for plant startup and power ascension with hold points for NRC approval at specifically designated power levels of 10%, 35% and 82%. (Reference P-87038, dated January 30, 1987.) (COMPLETE)

Item 91 "Supplemental 82% Power Level Submittal." This activity includes the response to nine NRC questions which were telecopied to PSC Licensing in late January and Revised GA Report GA909269, Issue A, "EES Cooldown for EQ and Appendix R Events With Vent Lines." (P-87055) (COMPLETE)

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Item 92 — "Additional Supplemental 82% Power Level Submittal." This activity involves the preparation of PSC responses to further NRC questions on the 82% power level submittal. This also covers the continued dialogue between NRC and PSC on these issues.

Item 93 — "C Engine Start Failure Analysis." Root cause analysis and resolution of problems associated with "C" Engine (Emergency Diesel Generator). (Reference LER 87-003, P-87088)

Item 94 — "NRC Review and Approve SSC Flowpath." This activity involves the NRC review of PSC Safe Shutdown Cooling submittals involving reheater elimination analysis, EES cooling capability, and FSAR accident reanalysis. This activity also includes NRC review and approval of 35% and 82% power levels.

Issue 95 — "PPS Spurious Trip Analysis." Analysis to determine root cause and define resolution for false trips. (One potential cause is thought to be electrical "noise.")

Item 96 — "High Energy Line Pipe Restraint Issues." This activity requires that various spring loaded pipe snubbers be inspected for proper settings prior to startup.

Item 97 — "Correct Demineralization Regeneration Problems." This item covers the replacement of acid lines in the demineralization area.

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