



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
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KING OF PRUSSIA, PENNSYLVANIA 19406-2713

August 4, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 –
INTEGRATED INSPECTION REPORT 05000277/2021002 AND
05000278/2021002

Dear Mr. Rhoades:

On June 30, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Peach Bottom Atomic Power Station, Units 2 and 3. On July 16, 2021, the NRC inspectors discussed the results of this inspection with Mr. Matthew Herr, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Jonathan E. Greives, Chief
Projects Branch 4
Division of Operating Reactor Safety

Docket Nos. 05000277 and 05000278
License Nos. DPR-44 and DPR-56

Enclosure:
As stated

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SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 –
 INTEGRATED INSPECTION REPORT 05000277/2021002 AND
 05000278/2021002 DATED AUGUST 4, 2021

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000277 and 05000278

License Numbers: DPR-44 and DPR-56

Report Numbers: 05000277/2021002 and 05000278/2021002

Enterprise Identifier: I-2021-002-0024

Licensee: Exelon Generation Company, LLC

Facility: Peach Bottom Atomic Power Station, Units 2 and 3

Location: Delta, PA 17314

Inspection Dates: April 1, 2021 to June 30, 2021

Inspectors: S. Rutenkroger, Senior Resident Inspector
P. Boguszewski, Senior Resident Inspector
J. Brand, Reactor Inspector
T. Corcoran, Project Engineer
T. Fish, Senior Operations Engineer
T. Hedigan, Operations Engineer

Approved By: Jonathan E. Greives, Chief
Projects Branch 4
Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Peach Bottom Atomic Power Station, Units 2 and 3, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

PLANT STATUS

Unit 2 began the inspection period at rated thermal power (RTP). On May 17, 2021, the unit was down powered to 9 percent for work inside the drywell that identified and repaired two conditions: nitrogen leakage from the instrument gas system and an increasing unidentified leak rate. The unit was returned to RTP on May 19, 2021. The unit was down powered to 70 percent for a follow-up control rod pattern adjustment on May 20, 2021, and returned to 100 percent RTP the following day. The unit remained at or near RTP for the remainder of the inspection period.

Unit 3 began the inspection period at RTP. On April 16, 2021, the unit was down powered to 53 percent for a control rod pattern adjustment, main turbine valve testing, and waterbox cleaning. The unit was returned to RTP the following day. On May 15, 2021, the unit was down powered to 68 percent for a control rod pattern adjustment and main turbine valve testing. The unit was returned to RTP the following day. On June 12, 2021, the unit was down powered to 68 percent for a control rod pattern adjustment, main turbine bypass valve exercising, and restoration of two hydraulic control units following maintenance. The unit was restored to RTP the following day. The unit remained at or near RTP for the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), resident and regional inspectors were directed to begin telework and to remotely access licensee information using available technology. During this time, the resident inspectors performed periodic site visits each week, increasing the amount of time on site as local COVID-19 conditions permitted. As part of their onsite activities, resident inspectors conducted plant status activities as described in IMC 2515, Appendix D; observed risk significant activities; and completed on site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of seasonal hot temperatures for the following systems: emergency diesel

generators (EDGs), station emergency batteries, 4kV switchgear rooms, control room, and drywell chillers as of June 10, 2021

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Unit 3 'A' residual heat removal (RHR) during Unit 3 'B' RHR testing and maintenance on April 26, 2021
- (2) Unit 2 high-pressure coolant injection (HPCI) during Unit 2 reactor core isolation coolant (RCIC) maintenance on June 1, 2021
- (3) Unit 3 'B' RHR following swing bus testing and prior to RCIC planned maintenance on June 11, 2021

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated system configurations during a complete walkdown of the Unit 3 RCIC during the weeks of May 10 and May 31, 2021

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) PF-132, Unit common diesel generator building, general area on April 1, 2021
- (2) PF-57, Unit 2 refuel floor on April 15, 2021
- (3) PF-78H, Unit common cable spreading and computer rooms on May 12, 2021
- (4) PF-127, Unit 2 turbine building, emergency battery and switchgear rooms, elevation 135' on June 23, 2021
- (5) PF-132, Unit common diesel generator building, general area on June 23, 2021

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (1 Sample)

The inspectors evaluated internal flooding mitigation protections in the:

- (1) Unit 2 RCIC room on June 25, 2021

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

- (1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam administered on April 6, 2021

71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Requalification Program (IP Section 03.04) (1 Sample)

- (1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered in March 2020

Annual Requalification Operating Tests

The inspectors evaluated the adequacy of the facility licensee's annual requalification operating test administered in March 2021

Administration of an Annual Requalification Operating Test

The inspectors evaluated the effectiveness of the facility licensee in administering requalification operating tests required by 10 CFR 55.59(a)(2) and that the facility licensee is effectively evaluating their licensed operators for mastery of training objectives

Requalification Examination Security

The inspectors evaluated the ability of the facility licensee to safeguard examination material, such that the examination is not compromised

Remedial Training and Re-examinations

The inspectors evaluated the effectiveness of remedial training conducted by the licensee, and reviewed the adequacy of re-examinations for licensed operators who did not pass a required requalification examination

Operator License Conditions

The inspectors evaluated the licensee's program for ensuring that licensed operators meet the conditions of their licenses

Control Room Simulator

The inspectors evaluated the adequacy of the facility licensee's control room simulator in modeling the actual plant, and for meeting the requirements contained in 10 CFR 55.46

Problem Identification and Resolution

The inspectors evaluated the licensee's ability to identify and resolve problems associated with licensed operator performance

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the main control room during preparations for a Unit 2 drywell entry, including a power reduction to 10 percent, on May 17, 2020, and again during EDG testing on June 29, 2021

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator requalification training in the simulator on April 19, 2021

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components remain capable of performing their intended function:

- (1) Unit common, 'E-4' EDG as of April 26, 2021
- (2) Unit common, power supply inverters as of June 10, 2021

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2 RCIC planned maintenance on April 6, 2021
- (2) Unit 3 RCIC planned maintenance on April 7, 2021
- (3) Unit 2 HPCI planned maintenance on April 12, 2021
- (4) Unit 3 'A' RHR heat exchanger planned cleaning and maintenance on April 19, 2021
- (5) Unit 2 emergent HPCI flow controller inverter failure on April 30, 2021
- (6) Unit 2 emergent 'K' safety-relief valve maintenance on May 18, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Unit 2 high-pressure service water (HPSW) RHR heat exchanger outlet valve junction box supported only by attached conduit on March 30, 2021
- (2) Unit common, reactor building water curtain fire systems' automatic actuation circuits were not being properly tested during surveillance testing identified on April 14, 2021
- (3) Unit common, HPSW hangers with gaps identified between the hanger shims and the piping on May 10 and 11, 2021
- (4) Unit 3 RCIC with degraded support spring can on May 11, 2021

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (2 Samples)

The inspectors evaluated the following temporary or permanent modifications:

- (1) Unit common, 'E-4' EDG's emergency service water pipe flexible expansion joints engineering change evaluation of dimensions as of April 14, 2021
- (2) Modification that installed steel reinforcing angles for seismic restraint with respect to Unit 2 masonry wall 'BW-76.8' as of May 5, 2021

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (9 Samples)

The inspectors evaluated the following post-maintenance test activities to verify system operability and functionality:

- (1) Unit 3 RCIC remote shutdown panel after inverter failure and replacement on April 7, 2021
- (2) Unit 3 'A' RHR heat exchanger testing after planned maintenance and cleaning on April 19 through April 22, 2021
- (3) Unit common, 'E-323' breaker testing after replacement on April 28, 2021
- (4) Unit 2 HPCI flow controller inverter testing after replacement on April 30, 2021
- (5) Unit common, high-pressure lube water pump pressure switch replacement and testing on May 5, 2021
- (6) Unit 2 RCIC system testing following planned system maintenance activities, including inverter replacement and valve work on June 3, 2021
- (7) Unit 2 'B' RHR and HPSW testing after valve maintenance on June 7, 2021
- (8) Unit common, 'E-3' EDG testing following scheduled maintenance overhaul on June 27, 2021
- (9) Unit 3 RCIC support spring can after repair on June 28, 2021

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (3 Samples)

- (1) Unit common, 'E-2' EDG slow start full load surveillance test on April 28, 2021
- (2) Unit 2 RHR alternate shutdown panel testing on April 29, 2021

- (3) Unit 3 RCIC pump, valve, and flow on June 15, 2021

71114.06 - Drill Evaluation

Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated a limited scope emergency preparedness drill conducted on June 25, 2021

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (2 Samples)

- (1) Unit 2 April 1, 2020 to March 31, 2021
- (2) Unit 3 April 1, 2020 to March 31, 2021

BI02: RCS Leak Rate Sample (IP Section 02.11) (2 Samples)

- (1) Unit 2 April 1, 2020 to March 31, 2021
- (2) Unit 3 April 1, 2020 to March 31, 2021

71152 - Problem Identification and Resolution

Semi-annual Trend Review (IP Section 02.02) (1 Sample)

- (1) The inspectors conducted a semi-annual trend review by evaluating sample issues that occurred in the first and second quarters of 2021. During the evaluation, the inspectors verified the issues identified were addressed within the scope of the corrective action program (CAP)

Annual Follow-up of Selected Issues (IP Section 02.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its CAP related to the following issues:

- (1) Fire penetration seals issues

71153 - Follow Up of Events and Notices of Enforcement Discretion

Personnel Performance (IP Section 03.03) (1 Sample)

- (1) The inspectors evaluated a declared unusual event due to the existence of smoke in the Unit 2 drywell and personnel unable to verify that no fire existed within 30 minutes and the licensee's subsequent performance on May 17, 2021

INSPECTION RESULTS

Observation: Fire Penetration Seals Issues	71152
<p>The inspectors reviewed Condition Reports 04312522, 04195447, and 04310888 which document Exelon's evaluation, extent of condition reviews, and corrective actions associated with fire penetration seals inspection deficiencies identified by their nuclear oversight (NOS) personnel during routine internal reviews of fire seals inspections per station procedures ST-M-037-311-2 and 3, "Detailed Visual Inspection of Fire Penetration Seals." The inspectors focused on Exelon's planned and/or implemented corrective actions to determine whether they were commensurate with the safety significance of the problems. The NOS findings which were initially identified on November 15, 2018 (AR 04195447), involved a review of the Peach Bottom Unit 2 fire penetration seals surveillance inspections completed in August 2018. Specifically, NOS identified documentation and tracking errors of numerous fire penetration seals that were inaccessible and could not be inspected, as well as other inspection documentation errors and the failure to resolve missing and incorrect information in the penetration Component Record List. Additionally, in January 2020, NOS' review of the Peach Bottom Unit 3 draft surveillance procedure resulted in identification of errors in the surveillance tracking tool used as a basis for the inspection procedure. As a result, 21 penetration seals were identified to be beyond the specified inspection frequency (AR 04310888). On January 24, 2020, NOS issued an elevated finding (AR 04312522) for continued lack of rigor and low sense of urgency to address indications of non-compliance with procedural requirements that contributed to on-going fire penetration seals inspection implementation gaps.</p> <p>Exelon's evaluation determined there were several causal factors that resulted in the deficiencies identified by NOS. These included deficiencies in the inspection scoping process (which was maintained manually and without peer reviews), documentation errors in completed inspection records, and incorrect equipment database.</p> <p>The inspectors review of corrective actions noted that Exelon staff formed a cross-discipline fire penetration seals recovery team comprised of design engineers, site and corporate fire protection program engineers, and maintenance to work through recovery actions and extent of condition reviews to address all the deficiencies identified by NOS. The inspectors reviewed the associated ARs and NOS information to assess whether the issue was accurately documented, evaluated, and to verify corrective actions have been timely and adequate. The inspectors also reviewed the engineering assessment to validate the assumptions and conclusions were supported, interviewed personnel including the fire protection system engineer, the mechanical design engineer, and the fire protection program manager, and performed independent fire seals inspections in safety-related areas of both Units 2 and 3 including; the switch gear rooms, battery rooms, cable spreading rooms, and the EDG rooms. No walkdown seal issues of significance were identified. The inspectors concluded the issue that resulted in the NOS findings were evaluated sufficiently to identify the causes and develop effective corrective actions, and that the extent of condition reviews were adequate. The inspectors also noted NOS performed a final review of the corrective actions implemented and closed out their findings on March 2, 2020. Corrective actions included: extent of condition reviews, employee training, complete re-baseline of the fire penetration seals inspection program, re-evaluation and creation of a new seal data base which included removal of all penetration seals determined to be inaccessible, revision of procedures to properly include the new list of all seals required to be inspected, and</p>	

inspection of seals identified as not inspected. The inspectors did not identify any findings of more than minor significance.

Observation: 71152 Semi-Annual Trend Review

71152

The inspectors conducted a semi-annual trend review by evaluating a sample of issues that occurred in the first and second quarters of 2021. During the evaluation, the inspectors verified the issues identified were addressed within the scope of the CAP. The inspectors reviewed health reports and related databases for trends and considered prior issues while performing routine walkdowns and attending the plan of the day meetings. No substantive adverse performance trends or repetitive equipment failures were identified during this time.

However, the inspectors' trend review noted some equipment failures during the quarter with similarity and overlapping risk. In particular, there were two failures of power supply inverters during the period, one in the Unit 3 RCIC system and one in the Unit 2 high-pressure injection system, and a failure of nitrogen supply to the Unit 2 '71K' safety-relief valve due to hose fretting. The inspectors noted that aggregate equipment failures can represent greater cumulative combined risk relative to the simple sum of the risk from individual events. As a result, systems and components may warrant additional focus to improve maintenance effectiveness when considering these impacts. Exelon's evaluations were not yet complete at the end of the quarter. However, the inspectors reviewed Exelon's initially planned actions and confirmed that the planned evaluations were robust, manufacturer and/or laboratory inputs were sought, the immediate corrective actions were appropriate, and effectiveness reviews were included when warranted.

The inspectors also observed a number of issues in the plant that was higher than recent prior periods. The inspectors shared an observation with Exelon that many of the issues were reasonably identifiable by their staff during routine activities. As one example, the inspectors identified a step-ladder designated for emergency use only, via an attached placard, which had been removed from its storage location and left setup in a standing position in a normally traversed room. The condition represented multiple breakdowns in Exelon's processes: a failure to adhere to the posted signage by using the ladder, a failure to adhere to station procedures to take down the ladder and lay it down and/or restrain it when not in use, a failure to adhere to station procedures to return the ladder to an approved storage location when work at the jobsite was complete, and a failure of personnel traversing through the room to question the ladder being upright and unattended for a period of time and still displaying the placard designating the ladder for emergency use only. The inspectors determined that all of the issues were of minor safety significance with no adverse impact to a cornerstone objective. However, the inspectors shared an observation regarding the potential for an adverse trend in a lack of attention to detail and non-compliance with procedures. In addition to addressing the individual issues, Exelon initiated an issue report to document a potential emerging trend and perform an analysis in order to improve station performance. Exelon also issued site-wide communications and engaged supervisors and staff to improve performance. The inspectors noted improved performance afterwards.

Based on the overall results of the semi-annual trend review, the inspectors determined that Exelon had identified adverse trends at Peach Bottom Atomic Power Station before they could become more significant safety problems. The inspectors continue to monitor the CAP and maintenance effectiveness during routine inspection activities.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On July 16, 2021, the inspectors presented the integrated inspection results to Mr. Matthew Herr, Site Vice President, and other members of the licensee staff.
- On May 26, 2021, the inspectors presented the PI&R Sample, Fire Penetration Seals Issues inspection results to Mr. Mark Parrish, Design Engineering Manager Lead, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Corrective Action Documents	04422956		
		04426956		
		04428901		
	Procedures	M-359	RCIC System	Revision 50
		SO 13.1.A-3 COL	RCIC System	Revision 17
	SO 13.1.B-3 COL	RCIC System Control Board Lineup	Revision 3	
71111.05	Procedures	PF-127	Unit 2 Turbine Building, Emergency Battery Switchgear Rooms, Elevation 135'0"	Revision 11
		PF-132	Diesel Generator Building, General Area, Elevation 127'0"	Revision 9
		PF-78H	Turbine Building Common, Cable Spreading and Computer Rooms	Revision 9
71111.06	Corrective Action Documents	4424351		
	Miscellaneous	EC 634394		
	Procedures	AO 20A.1	Temporary Removal and Installation of Flood Barriers on the Reactor Building Drainage System	Revision 18
71111.15	Corrective Action Documents	4422956		
		4416510		
		4422713		
		4422952		
	Corrective Action Documents Resulting from Inspection	04412724		
Miscellaneous	EC 634268			
71111.18	Calculations	87RE/CONN	Design of Additional Support for the Connection Between Block Wall and Concrete Wall	Revision 3
	Corrective Action Documents	4422138		
	Miscellaneous	EC 624203, XJ-70133D/134D	Exp. Joint Misalign Measurement Out of Tolerance	Revision 0
71111.19	Corrective Action	4431791		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents	4431792 4431794		
	Procedures	RT-O-052-253-2	'E-3' Diesel Generator Inspection Post-Maintenance Functional Test	Revision 44
	Work Orders	04325592 05120294 05124552 05126927		
		5136414		
71111.22	Work Orders	5128336		
71114.06	Procedures	EP-AA-1007, Addendum 3	Emergency Action Levels for Peach Bottom Atomic Power Station	Revision 9
71152	Corrective Action Documents	04195447		
		04310888		
		04312522		
		04378513		
	Corrective Action Documents Resulting from Inspection	04421136		
		04422880		
		4395106		
		4399049		
		4401017		
		4405806		
		4410976		
		4413233		
		4420472		
4420571				
4426780				
4428531				
4428772				
4430092				
	Miscellaneous	Technical Evaluation 1291255-01	Justification for not Inspecting Inaccessible Penetration Seals	01