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10 CFR 50.55a

April 7, 2022
Serial: RA-22-0117

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

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400/Renewed License No. NPF-63

Subject: Relief Request for Inservice Testing Program Plan – Fourth Ten-Year Interval

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(1), Duke Energy Progress, LLC (Duke Energy), hereby requests Nuclear Regulatory Commission (NRC) approval of the attached relief request for the Shearon Harris Nuclear Power Plant, Unit 1 (HNP). The provisions of this relief are applicable to the fourth ten-year inservice testing (IST) program interval at HNP, which commenced on May 2, 2017, and is currently scheduled to end on April 30, 2027, as identified in the Fourth Interval Inservice Testing Program Plan, HNP-IST-004 Revision 0, submitted to the NRC on April 27, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17117A702).

10 CFR 50.55a(f) requires IST of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 pumps and valves. 10 CFR 50.55a(f)(4)(ii) requires that IST programs conducted during successive ten-year inspection intervals following the initial ten-year interval comply with the requirements of the latest edition and addenda of the Code, incorporated by reference in paragraph (b) of 10 CFR 50.55a, eighteen months prior to the start of the ten-year interval, subject to the limitations and modifications listed within paragraph (b) of that section. Therefore, the HNP Inservice Testing Program Plan is based on the requirements of the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through 2006 Addenda. Accordingly, the enclosed relief request is sought from the requirements of the 2004 Edition of the ASME OM Code, through the 2006 Addenda, specifically ISTC-3700, "Position Verification Testing."

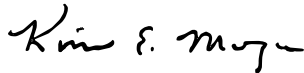
By letter dated December 8, 2020 (ADAMS Accession No. ML20259A512), the NRC issued HNP a license amendment to revise Technical Specification 6.8.4.k, "Containment Leakage Rate Testing Program," to reference the guidance in Nuclear Energy Institute (NEI) 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," and conditions and limitations specified in NEI 94-01, Revision 2-A. The license amendment also allowed the extension of the containment isolation valve leakage test (i.e., Type C tests) from 60 months to 75 months in accordance with NEI 94-01, Revision 3-A for components with established good performance in the 10 CFR 50 Appendix J, Option B performance-based leakage-testing program. However, ISTC-3700 requires valves with remote position indicators be observed at least once every two years to verify that valve operation is accurately indicated, which is in conflict with the allowable Option B performance-based interval for valves eligible for an extended Type C test interval. Therefore, Duke Energy is hereby

submitting a relief request to align the testing frequency with the 10 CFR 50 Appendix J, Option B program, which now specifies an interval limit of 75 months.

Duke Energy requests approval of this relief request, pursuant to 10 CFR 50.55a(z)(1), by October 7, 2022, to support the next scheduled refueling outage at HNP.

This letter contains no new regulatory commitments. Please refer any questions regarding this submittal to Lee Grzeck, Acting Manager – Nuclear Fleet Licensing, at 980-373-1530.

Sincerely,



Kim E. Maza
Site Vice President
Harris Nuclear Plant

Enclosure: Relief Request HNP-IST-004-RR1 for Inservice Testing Program Plan - Fourth Ten-Year Interval

Attachment 1: Valve Local Leakage Rate Test (LLRT) History Sample (Last Three Tests)
Attachment 2: Position Indication Test History Sample (Last Three Tests)

cc: J. Zeiler, NRC Senior Resident Inspector, HNP
C. Smith, NRC Resident Inspector, HNP
A. Hon, NRC Project Manager, HNP
NRC Regional Administrator, Region II

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Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400/Renewed License No. NPF-63

Relief Request HNP-IST-004-RR1 for Inservice Testing Program Plan - Fourth Ten-Year
Interval

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Relief to Perform Position Indication Testing at Appendix J Option B Frequency

1. ASME Code Components Affected

Active safety-related Target Rock solenoid operated valves that are required by subsection ISTC-3700, "Position Verification Testing," of the 2004 Edition through 2006 Addenda of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants (OM) Code to be observed locally at least once every two years to verify that valve operation is accurately indicated. Where practicable, this local observation should be supplemented by other indications such as use of flowmeters or other suitable instrumentation to verify obturator position. These observations need not be concurrent. Where local observation is not possible, other indications shall be used for verification of valve operation. The specific valves covered by this relief request are tabulated below.

Valve ID	Function	Safety Position
1SP-12	Hydrogen Analyzer Cabinet "1A" Supply Iso Vlv (CIV)	CLOSED
1SP-16	REM-3502A Inlet from Containment Atmosphere Iso Vlv (CIV)	CLOSED
1SP-40	Pressurizer Liquid Space Sample Iso Vlv (CIV)	CLOSED
1SP-41	Pressurizer Liquid Space Sample Iso Vlv (CIV)	CLOSED
1SP-42	Hydrogen Analyzer Cabinet "1B" Supply Iso Vlv (CIV)	CLOSED
1SP-59	Pressurizer Steam Space Sample Iso Vlv (CIV)	CLOSED
1SP-60	Pressurizer Steam Space Sample Iso Vlv (CIV)	CLOSED
1SP-62	Hydrogen Analyzer Cabinet "1B" Return Iso Vlv (CIV)	CLOSED
1SP-78	SIS Accumulator "A" Sample Iso Vlv (CIV)	CLOSED
1SP-81	SIS Accumulator "B" Sample Iso Vlv (CIV)	CLOSED
1SP-84	SIS Accumulator "C" Sample Iso Vlv (CIV)	CLOSED
1SP-85	SIS Accumulator Sample Iso Vlv (CIV)	CLOSED
1SP-200	PASS Liquid Return Header Iso Vlv (CIV)	CLOSED
1SP-201	PASS Liquid Return Header Iso Vlv (CIV)	CLOSED
1SP-208	PASS Gas Return Header Iso Vlv (CIV)	CLOSED
1SP-209	PASS Gas Return Header Iso Vlv (CIV)	CLOSED
1SP-915	Hydrogen Analyzer Cabinet "1A" Supply Iso Vlv (CIV)	CLOSED
1SP-916	REM-3502A Inlet from Containment Atmosphere Iso Vlv (CIV)	CLOSED
1SP-917	Hydrogen Analyzer Cabinet "1A" Return Iso Vlv (CIV)	CLOSED
1SP-918	REM-3502A Sample Return to Containment Atmosphere Iso Vlv (CIV)	CLOSED
1SP-919	Hydrogen Analyzer Cabinet "1B" Supply Iso Vlv (CIV)	CLOSED
1SP-939	REM-3502A Sample Return to Containment Atmosphere Iso Vlv (CIV)	CLOSED
1SP-941	Hydrogen Analyzer Cabinet "1A" Return Iso Vlv (CIV)	CLOSED
1SP-943	Hydrogen Analyzer Cabinet "1B" Return Iso Vlv (CIV)	CLOSED
1SP-948	RCS Sample Line Iso Vlv (CIV)	CLOSED
1SP-949	RCS Sample Line Iso Vlv (CIV)	CLOSED
Legend: Iso Vlv (CIV) – Isolation Valve (Containment Isolation Valve) REM – Radioactive Effluent Monitor SIS – Safety Injection System PASS – Post Accident Sampling System		

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2. Applicable Code Edition and Addenda

ASME OM Code, 2004 Edition through 2006 Addenda.

3. Applicable Code Requirement

Relief is requested from Subsection ISTC of the ASME OM Code, 2004 Edition through 2006 Addenda, Subsection ISTC-3700, "Position Verification Testing", which states:

"Valves with remote position indicators shall be observed locally at least once every two years to verify that valve operation is accurately indicated. Where practicable, this local observation should be supplemented by other indications such as use of flowmeters or other suitable instrumentation to verify obturator position. These observations need not be concurrent. Where local observation is not possible, other indications shall be used for verification of valve operation."

4. Reason For Request

Historically, Shearon Harris Nuclear Power Plant, Unit 1 (Shearon Harris) has utilized Local Leak Rate Test (LLRT) procedures, performed on an Appendix J Option A schedule (every refuel), for verifying the remote position indications for the tabulated valves are accurate, as local observation of solenoid movement is prohibited by valve design. Shearon Harris has recently implemented Amendment No. 181 (ADAMS Accession No. ML20259A512) to renewed Facility Operating License No. NPF-63 to adopt Option B of 10 CFR 50 Appendix J consistent with Nuclear Energy Institute (NEI) 94-01, Revision 3-A "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." Under Option B, and its performance-based Type C test intervals, a Type C valve may have its LLRT interval extended up to 75 months upon completion of two consecutive periodic as-found Type C tests where the results of each test is within a licensee's allowable administrative limits. ISTC-3700 requires the verification of valve operation every two years, which is in conflict with the allowable Option B performance-based interval for valves eligible for an extended Type C test interval. Shearon Harris proposes an alternative to the provisions of ISTC-3700 to allow utilization of the Option B LLRT schedule for scheduling the ISTC-3700 position verification tests for the listed solenoid valves that qualify for testing on a frequency eligible under Option B.

5. Proposed Alternative and Basis For Use

In accordance with ISTC-3700, where local observation is not possible, other indications shall be used to verify valve position. Shearon Harris performs and utilizes procedure EST-212, "Type C Local Leak Rate Tests," to confirm closed indication when pressurizing these solenoid valves to a differential pressure of greater than or equal to the calculated peak containment internal pressure related to the design basis loss-of-coolant accident (P_a , 41.8 psig) during local leak rate testing. Open indication is confirmed for these solenoid valves by verification of an increase in makeup flow when the valve is taken to the open position. This method satisfies the requirement for position indication verification and

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ensures that the indicating lights correspond to valve position. The subject valves are designed such that the position of the valve is not locally observable.

The Shearon Harris Inservice Testing Program ISTC-3700 requirements for these valves are performed in conjunction with local leak rate testing as described above due to solenoid valve design. Shearon Harris has recently implemented Amendment No. 181 to adopt Option B of 10 CFR 50 Appendix J consistent with NEI 94-01, Revision 3-A.

Under Option B, and its performance-based Type C test intervals, a Type C valve may have its LLRT interval extended up to 75 months upon completion of two consecutive periodic as-found Type C tests where the results of each test are within a licensee's allowable administrative limits.

For the subject solenoid valves, as an alternative to the ISTC-3700 two-year frequency requirement, Shearon Harris requests relief from the ISTC-3700 frequency requirements and proposes to perform the alternate method where local leak rate equipment is used to confirm indication is accurate for these solenoid valves where local observation is not possible on the Option B schedule of NEI 94-01, Revision 3-A. The qualification of a valve for an extended Type C test interval under 10 CFR 50 Appendix J Option B, based on successful LLRT, is one general indicator of the structure, system, or component's (SSC's) operational readiness.

The operational readiness of these SSCs is also monitored during quarterly inservice testing. Shearon Harris procedure OST-1038, "Sampling, Chemical Addition, and Main Steam Drain Systems ISI [Inservice Inspection] Valve Test Quarterly Interval Mode 1 - 4" or OST-1062 "Sampling, Chemical Addition, And Main Steam Drain Systems ISI Valve Test And Remote Position Indication Test 2 Year Interval Modes 1, 2, 3 And 4" performs a quarterly fail safe (closed) test of the valves in conjunction with stroke time testing to the closed (safety) position of the valve. The quarterly measurement of stroke time and its comparison to the applicable criteria of ISTC-5152, "Stroke Test Acceptance Criteria," provides another general indicator of the SSC's operational readiness in addition to the testing performed under 10 CFR 50, Appendix J.

In conclusion, the ability to detect degradation of these SSCs and ensure their operational readiness is performed quarterly during fail safe and stroke time (closed) testing during OST-1038 or OST-1062. A further assessment of the components' operational readiness is assessed during Type C testing on an Option B (NEI 94-01, Rev 3-A) schedule, with valves exhibiting acceptable local leakage rate testing performance eligible for testing on an extended test interval of up to 75 months. Performance of the ISTC-3700 indicator check on an Option B schedule provides an acceptable level of quality and safety, for those qualifying for local leakage rate testing on said schedule, in conjunction with quarterly fail safe and stroke time testing.

6. Duration of Proposed Alternative

The proposed alternative is requested for the remainder of the Shearon Harris fourth 10-year inservice testing program interval, which began of May 2, 2017 and will end on April 30, 2027.

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7. Precedents

A similar request was approved for Fermi, Unit 2 (ADAMS Accession No. ML17354B002), which requested ISTC-3700 requirements be aligned with 10 CFR 50 Appendix J, Option B for valves eligible for testing on an Option B schedule.

8. References

None.

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Attachment 1

ATTACHMENT 1

Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

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Relief to Perform Position Indication Testing at Appendix J Option B Frequency

Attachment 1 – Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

Valve Number	Admin. Limit (sccm)	As-Found LLRT Date	As-Found Measured Value (sccm)	Sat or Unsat	As-Left LLRT Date	As-Left Measured Value (sccm)	Sat or Unsat
1SP-12	≤ 500	04/26/2021	31	Sat.	04/26/2021	31	Sat.
		10/15/2019	24	Sat.	10/15/2019	24	Sat.
		04/08/2018	56	Sat.	04/27/2018	133	Sat.
1SP-16	≤ 300	04/25/2021	109	Sat.	04/25/2021	109	Sat.
		10/16/2019	1230	Unsat.	10/28/2019	40	Sat.
		04/23/2018	1593	Unsat.	04/23/2018	1593	Unsat.*
1SP-40	≤ 300	04/28/2021	3332	Unsat.	05/09/2021	3723	Unsat.**
		10/15/2019	24	Sat.	10/15/2019	24	Sat.
		04/23/2018	36	Sat.	04/23/2018	36	Sat.
1SP-41	≤ 300	04/28/2021	4058	Unsat.	05/09/2021	3833	Unsat.**
		10/15/2019	24	Sat.	10/28/2019	24	Sat.
		04/23/2018	24	Sat.	04/23/2018	24	Sat.
1SP-42	≤ 300	10/28/2019	49	Sat.	10/28/2019	49	Sat.
		04/18/2018	32	Sat.	04/18/2018	32	Sat.
		10/22/2016	24	Sat.	10/22/2016	24	Sat.
1SP-59	≤ 300	04/27/2021	62	Sat.	05/07/2021	60	Sat.
		10/30/2019	24	Sat.	10/30/2019	24	Sat.
		04/09/2018	24	Sat.	04/09/2018	24	Sat.

(*) 1SP-16 leakage of 1593 sccm (≤ 300 sccm) accepted under evaluation EC #412101.

(**) 1SP-40 and 1SP-41 elevated leakage rates accepted under evaluation EC #419545.

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Attachment 1 – Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

Valve Number	Admin. Limit (sccm)	As-Found LLRT Date	As-Found Measured Value (sccm)	Sat or Unsat	As-Left LLRT Date	As-Left Measured Value (sccm)	Sat or Unsat
1SP-60	≤ 300	05/07/2021	104	Sat.	05/07/2021	104	Sat.
		10/30/2019	24	Sat.	10/30/2019	24	Sat.
		04/09/2018	169	Sat.	04/09/2018	169	Sat.
1SP-62	≤ 300	04/27/2021	34	Sat.	04/27/2021	34	Sat.
		10/28/2019	165	Sat.	10/28/2019	165	Sat.
		04/18/2018	54	Sat.	04/18/2018	54	Sat.
1SP-78	≤ 500	04/28/2021	24	Sat.	04/28/2021	24	Sat.
		10/29/2019	48	Sat.	10/29/2019	48	Sat.
		04/28/2018	28	Sat.	04/28/2018	28	Sat.
1SP-81	≤ 500	04/28/2021	56	Sat.	04/28/2021	56	Sat.
		10/29/2019	52	Sat.	10/29/2019	52	Sat.
		04/28/2018	24	Sat.	04/28/2018	24	Sat.
1SP-84	≤ 300	04/26/2021	88	Sat.	04/28/2021	710	Unsat.*
		10/29/2019	69	Sat.	10/29/2019	69	Sat.
		04/28/2018	152	Sat.	04/28/2018	152	Sat.

(*) 1SP-84 leakage of 710 sccm (≤ 300 sccm) accepted under evaluation EC #419545.

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Attachment 1 – Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

Valve Number	Admin. Limit (sccm)	As-Found LLRT Date	As-Found Measured Value (sccm)	Sat or Unsat	As-Left LLRT Date	As-Left Measured Value (sccm)	Sat or Unsat
1SP-85	≤ 300	04/26/2021	355	Unsat.	04/28/2021	596	Unsat.*
		10/29/2019	188	Sat.	10/29/2019	188	Sat.
		04/28/2018	106	Sat.	04/28/2018	106	Sat.
1SP-200	≤ 300	05/07/2021	83	Sat.	05/08/2021	83	Sat.
		11/04/2019	34	Sat.	11/05/2019	82	Sat.
		04/23/2018	74	Sat.	04/24/2018	75	Sat.
1SP-201	≤ 300	04/26/2021	862	Unsat.	05/08/2021	5059	Unsat.**
		11/04/2019	4022	Unsat.	11/05/2019	4296	Unsat.**
		04/23/2018	4508	Unsat.	04/24/2018	4092	Unsat.**
1SP-208	≤ 300	05/07/2021	35	Sat.	05/07/2021	35	Sat.
		10/16/2019	91	Sat.	10/16/2019	91	Sat.
		04/22/2018	41	Sat.	04/22/2018	41	Sat.
1SP-209	≤ 300	05/07/2021	58	Sat.	05/07/2021	58	Sat.
		10/16/2019	79	Sat.	10/16/2019	79	Sat.
		04/22/2018	28	Sat.	04/22/2018	28	Sat.

(*) 1SP-85 leakage of 596 sccm (≤ 300 sccm) accepted under evaluation EC #419545.

(**) 1SP-201 elevated leak rates accepted under EC #412101 (2018), EC #416496 (2019), and EC #419545 (2021).

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Attachment 1 – Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

Valve Number	Admin. Limit (sccm)	As-Found LLRT Date	As-Found Measured Value (sccm)	Sat or Unsat	As-Left LLRT Date	As-Left Measured Value (sccm)	Sat or Unsat
1SP-915	≤ 300	04/26/2021	66	Sat.	04/26/2021	66	Sat.
		10/15/2019	24	Sat.	10/15/2019	24	Sat.
		04/18/2018	762	Unsat.	05/01/2018	25	Sat.
1SP-916	≤ 300	04/25/2021	94	Sat.	04/25/2021	94	Sat.
		10/16/2019	24	Sat.	10/28/2019	34	Sat.
		04/23/2018	24	Sat.	04/23/2018	24	Sat.
1SP-917	≤ 300	10/14/2019	148	Sat.	10/14/2019	148	Sat.
		04/11/2018	92	Sat.	04/28/2018	63	Sat.
		10/10/2016	153	Sat.	10/10/2016	153	Sat.
1SP-918	≤ 300	04/25/2021	96	Sat.	04/25/2021	96	Sat.
		10/14/2019	42	Sat.	10/29/2019	39	Sat.
		04/08/2018	42	Sat.	04/28/2018	48	Sat.
1SP-919	≤ 300	10/28/2019	32	Sat.	10/28/2019	32	Sat.
		04/18/2018	24	Sat.	04/18/2018	24	Sat.
		10/22/2016	24	Sat.	10/22/2016	24	Sat.

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Attachment 1 – Valve Local Leak Rate Test (LLRT) History Sample (Last Three Tests)

Valve Number	Admin. Limit (sccm)	As-Found LLRT Date	As-Found Measured Value (sccm)	Sat or Unsat	As-Left LLRT Date	As-Left Measured Value (sccm)	Sat or Unsat
1SP-939	≤ 300	04/25/2021	101	Sat.	04/25/2021	101	Sat.
		10/14/2019	199	Sat.	10/29/2019	36	Sat.
		04/08/2018	40	Sat.	04/28/2018	49	Sat.
1SP-941	≤ 300	10/14/2019	78	Sat.	10/14/2019	78	Sat.
		04/11/2018	24	Sat.	04/28/2018	24	Sat.
		10/10/2016	48	Sat.	10/10/2016	48	Sat.
1SP-943	≤ 300	04/27/2021	68	Sat.	04/27/2021	68	Sat.
		10/28/2019	253	Sat.	10/28/2019	253	Sat.
		04/18/2018	73	Sat.	04/18/2018	73	Sat.
1SP-948	≤ 300	04/28/2021	27	Sat.	05/06/2021	61	Sat.
		10/29/2019	24	Sat.	10/29/2019	24	Sat.
		04/22/2018	24	Sat.	05/02/2018	24	Sat.
1SP-949	≤ 300	05/06/2021	24	Sat.	05/06/2021	24	Sat.
		10/29/2019	24	Sat.	10/29/2019	24	Sat.
		04/22/2018	24	Sat.	05/02/2018	24	Sat.

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Attachment 2

ATTACHMENT 2

Position Indication Test History Sample (Last Three Tests)

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Attachment 2 – Position Indication Test History Sample (Last Three Tests)

Valve Number	Test Date	Status	Procedure Number
1SP-12	04/26/2021	PASS	EST-212
	10/15/2019	PASS	EST-212
	04/27/2018	PASS	EST-212
1SP-16	04/25/2021	PASS	EST-212
	10/28/2019	PASS	EST-212
	04/23/2018	PASS	EST-212
1SP-40	05/09/2021	PASS	EST-212
	10/15/2019	PASS	EST-212
	04/23/2018	PASS	EST-212
1SP-41	05/09/2021	PASS	EST-212
	10/28/2019	PASS	EST-212
	04/23/2018	PASS	EST-212
1SP-42	03/19/2022	PASS	WO #20523117
	10/28/2019	PASS	EST-212
	04/18/2018	PASS	EST-212
1SP-59	05/07/2021	PASS	EST-212
	10/30/2019	PASS	EST-212
	04/09/2018	PASS	EST-212
1SP-60	05/07/2021	PASS	EST-212
	10/30/2019	PASS	EST-212
	04/09/2018	PASS	EST-212
1SP-62	04/27/2021	PASS	EST-212
	10/28/2019	PASS	EST-212
	04/18/2018	PASS	EST-212
1SP-78	04/28/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212

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Attachment 2 – Position Indication Test History Sample (Last Three Tests)

Valve Number	Test Date	Status	Procedure Number
1SP-81	04/28/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-84	04/28/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-85	04/28/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-200	05/08/2021	PASS	EST-212
	11/05/2019	PASS	EST-212
	04/24/2018	PASS	EST-212
1SP-201	05/08/2021	PASS	EST-212
	11/05/2019	PASS	EST-212
	04/24/2018	PASS	EST-212
1SP-208	05/07/2021	PASS	EST-212
	10/16/2019	PASS	EST-212
	04/22/2018	PASS	EST-212
1SP-209	05/07/2021	PASS	EST-212
	10/16/2019	PASS	EST-212
	04/22/2018	PASS	EST-212
1SP-915	04/26/2021	PASS	EST-212
	10/15/2019	PASS	EST-212
	05/01/2018	PASS	EST-212
1SP-916	04/25/2021	PASS	EST-212
	10/28/2019	PASS	EST-212
	04/23/2018	PASS	EST-212

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Attachment 2 – Position Indication Test History Sample (Last Three Tests)

Valve Number	Test Date	Status	Procedure Number
1SP-917	03/19/2022	PASS	WO #2053117
	10/14/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-918	04/25/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-919	03/19/2022	PASS	WO #2053117
	10/28/2019	PASS	EST-212
	04/18/2018	PASS	EST-212
1SP-939	04/25/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-941	03/19/2022	PASS	WO #2053117
	10/14/2019	PASS	EST-212
	04/28/2018	PASS	EST-212
1SP-943	04/27/2021	PASS	EST-212
	10/28/2019	PASS	EST-212
	04/18/2018	PASS	EST-212
1SP-948	05/06/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	05/02/2018	PASS	EST-212
1SP-949	05/06/2021	PASS	EST-212
	10/29/2019	PASS	EST-212
	04/22/2018	PASS	EST-212