UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

January 5, 2023

Mr. Terry Brown
Site Vice President
Energy Harbor Nuclear Corp.
Davis-Besse Nuclear Power Station
5501 N. State Rte. 2, Mail Stop A–DB–3080
Oak Harbor, OH 43449–9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000346/2022011

Dear Terry Brown:

On November 22, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Davis-Besse Nuclear Power Station and discussed the results of this inspection with you 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,

Richard A. Skokowski Signed by Skokowski, Richard on 01/05/23

Richard A. Skokowski, Chief
Engineering Branch 2
Division of Operating Reactor Safety

Docket No. 05000346
License No. NPF-3

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

Letter for Terry Brown from Richard A. Skokowski dated January 05, 2023.

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000346/2022011

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000346
License Number:	NPF-3
Report Number:	05000346/2022011
Enterprise Identifier:	I-2022-011-0036
Licensee:	Energy Harbor Nuclear Corp.
Facility:	Davis-Besse Nuclear Power Station
Location:	Oak Harbor, OH
Inspection Dates:	October 03, 2022 to November 22, 2022
Inspectors:	K. Barclay, Senior Reactor Inspector M. Domke, Reactor Inspector B. Jose, Senior Reactor Inspector
Approved By:	Richard A. Skokowski, Chief Engineering Branch 2 Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a triennial fire protection inspection at Davis-Besse Nuclear Power Station, 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

Type	Issue Number	Title	Report Section	Status
URI	05000346/2022011-01	Multiple NFPA 805 Non-Power Operation Transition Issues	71111.21N.05	Open
URI	05000346/2021050-07	Potential High Emergency Diesel Generator Field Currents When Adding Manual Loads	71111.21N.05	Closed

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.

REACTOR SAFETY

71111.21N.05 - Fire Protection Team Inspection (FPTI)

Structures, Systems, and Components (SSCs) Credited for Fire Prevention, Detection, Suppression, or Post-Fire Safe Shutdown Review (IP Section 03.01) (3 Samples)

The inspectors verified that components and/or systems will function as required to support the credited functions stated for each sample. Additional inspection considerations are located in the fire hazards analysis (FHA) or safe shutdown analysis (SSA).

(1) Fire Zone 237, AFW Pump 1-1 Room, Fire Compartment E-01**,** Fire Detectors, Dampers, and Suppression Systems
(2) Auxiliary Feedwater (AFW) Pump 1-1, for Post-Fire Safe Shutdown Review
(3) Fire Pumps and Associated Hydraulic Calculation from SSCs Credited for Fire Prevention, Detection, Suppression Perspective

Fire Protection Program Administrative Controls (IP Section 03.02) (2 Samples)

The inspectors verified that the selected control or process is implemented in accordance with the licensee's current licensing basis. If applicable, ensure that the licensee's Fire Protection Program (FPP) contains adequate procedures to implement the selected administrative control. Verify that the selected administrative control meets the requirements of all committed industry standards.

(1) Combustible Control Program
(2) National Fire Protection Association (NFPA) 805 Monitoring Program

Fire Protection Program Changes/Modifications (IP Section 03.03) (2 Samples)

The inspectors verified the following:

a. Changes to the approved FPP do not constitute an adverse effect on the ability to safely shutdown.
b. The adequacy of the design modification, if applicable.
c. Assumptions and performance capability stated in the SSA have not been degraded through changes or modifications.
d. The FPP documents, such as the Updated Final Safety Analysis Report, fire protection report, FHA, and SSA were updated consistent with the FPP or design change.

e. Post-fire Safe Shutdown (SSD) operating procedures, such as abnormal operating procedures, affected by the modification were updated.

(1) FPPCE 22-001, Replacement Valves for Obsolete Fire Protection United Brass Model 45S
(2) FPPCE 22-003, Replacement of TPCW Pump Motors MP7-1 and MP7-3

INSPECTION RESULTS

Unresolved Item (Open)	Multiple NFPA 805 Non-Power Operation Transition Issues URI 05000346/2022011-01	71111.21 N.05

Description:

During the Fire Protection Team Inspection (FPTI), the inspectors identified multiple issues associated with the licensee's implementation of their National Fire Protection Association (NFPA) 805 Non-Power Operation (NPO) program.

- A review of the licensee's NFPA 805 license amendment request (ADAMS Accession Number ML1530A314) and associated supplement (ADAMS Accession Number ML16351A330), the inspectors found the licensee's statement that they would revise plant procedures to incorporate the insights, strategies, and analysis recommended or documented in their NPO Modes Transition Report and add the necessary procedure steps to ensure that key safety functions (KSFs) are achieved and maintained. The inspectors found that the licensee attempted to implement software controls instead of robust procedures and did not incorporate the insights, strategies, and analysis from their NPO Modes Transition Report into their plant procedures. Additionally, the inspectors found that the licensee did not add the necessary procedure steps to ensure that KSFs were achieved and maintained.

- The licensee's fire risk software was intended to prohibit hot work permits in fire compartments that contained pinch points during outage high risk evolutions (HREs). A pinch point is a fire area or compartment where a single fire could cause a loss of all success paths for a specific shutdown KSF. The software was found to be missing at least 10 fire compartments that should have been flagged as containing a pinch point. Some of the missing fire compartments contained multiple KSF pinch points including one compartment that contained 3 KSFs (Decay Heat Removal, Inventory Control, and Support/Electrical). These missing fire compartments were unprotected during the 2022 refueling outage HRE. An outage review found that only one fire compartment potentially had hot work conducted during the HRE time frame.

- The inspectors found that the licensee did not have procedures for implementing all the necessary NFPA 805 NPO features within their fire risk software but relied on informal notes. The licensee's informal notes did not specify that all pinch points needed to be protected during HREs. During the 2022 refueling outage HRE, the licensee only selected Inventory Control for hot work permit prevention; however, the decay heat removal, reactivity and support/electrical KSFs should have also been selected. This software implementation error led to four additional compartments being unprotected.

- The licensee's Fire Hazards Analysis Report, which is also their fire protection program design basis document, contained a "Non-Power Operations (NPO) Modes Compliance Summery" for each fire area (compartment). The NPO Modes Compliance Summary template stated, in part, that each compartment summary will contain "…any associated pinch points in the fire compartment and any features and/or controls that provide reasonable assurance that the fuel will be maintained in a safe and stable configuration…" The inspectors found that the NPO Modes Compliance Summary was inaccurate for all fire compartments that contained a pinch point at Davis-Besse. Specifically, all 46 pinch-point fire compartments contained the following summary, "The potential effects of a fire occurring during NPO modes in this fire compartment were reviewed. This review was conducted using the methodology as described in Calculation ARS-DB-11-003. This area does not have any associated pinch points. The lack of failures resulting in a pinch point provides reasonable assurance the fuel will be maintained in a safe and stable configuration. Therefore, the NFPA 805 performance goal for NPO is satisfied."

Davis-Besse Facility Operating License Condition 2.C.(4), Fire Protection, stated, in part, that the licensee shall implement the items listed in Attachment S, Table S-2, "Implementation Items," to the FENOC letter dated November 20, 2018, within 2 years following issuance of the license amendment.

Attachment S, Table S-2, "Implementation Items," found in FENOC letter dated November 20, 2018 (ADAMS Accession Number ML18324A677), contained item DB-1908, "Revise Procedures and Conduct Training to Implement NPO Requirements for NFPA 805," and item DB-2049, "Develop the DBNPS NFPA 805 Design Basis Document."

The inspectors were concerned that the licensee's overall implementation of their NFPA 805 NPO program was not consistent with their license amendment request and associated supplements.

Planned Closure Actions: The inspectors need to consult with the Office of Nuclear Reactor Regulation (NRR) to determine if these issues represent a failure to complete an NFPA 805 transition license condition or other traditional enforcement violation. Additionally, the inspectors need to determine if the differences in implementation would have changed the Agency's conclusion on approving the NFPA 805 license amendment request.

Licensee Actions: There are no immediate licensee actions needed for this unresolved issue. As the inspectors work with NRR, additional questions may develop that will be communicated to the licensee.

Corrective Action References:

CR-2022-07442: 2022 FP Inspection - FHAR Contains Incorrect NPO Compliance Summary
CR-2022-07489: 2022 FP Inspection - Fire Protection Expert Software Issue
CR-2022-07930: 2022 FP Inspection - Implementation of NPO Does Not Account for All Key Safety Functions

URI	Potential High Emergency Diesel Generator Field Currents When Adding Manual Loads URI 05000346/2021050-07	71111.21N.05

Description:

(Closed) URI 05000346/2021050-07 "Potential High Emergency Diesel Generator Field Currents When Adding Manual Loads"

During the special inspection related to multiple Emergency Diesel Generator (EDG) failures that took place from July 2019 to June 2021, as well as a reactor trip with multiple complicating equipment issues, the inspectors identified an Unresolved Item (URI) 05000346/2021050-07 "Potential High Emergency Diesel Generator Field Currents When Adding Manual Loads."

On June 24, 2021, while testing the Division 1 EDG, the licensee observed that the EDG output voltage was almost 10 percent above the nominal value. The licensee found that the internal circuit of the RA-70 microprocessor-based reference unit had failed. The RA-70 provides a resistance reference value to the automatic voltage regulator, and it had failed to its high limit setpoint. The licensee repaired the EDG, returned it to service, and performed several assessments to determine if the high voltage condition would have prevented the EDG from performing its safety function and assessed the effects of the high voltage condition on the operation of loads connected to the EDG.

The Team independently reviewed the evaluation and found that the conclusions associated with the downstream EDG loads were reasonable. However, the Team also found that the evaluation did not completely address the effects of adding manual loads to the EDG after automatic load sequencing, and the potential increase in generator exciter current levels. The Team's concern was that the increased generator exciter currents could cause an exciter component failure and prevent proper operation of the EDG. The licensee subsequently had their contractor (MPR Associates) revise the evaluation to address the concern associated with high generator exciter currents. However, the evaluation was not completed before the conclusion of the special inspection. As a result, the Team was required to document this issue as an Unresolved Item.

The licensee provided the updated high voltage assessment; MPR Associates Report 0200-0213-RPT-001, Revision 3 to the Team on October 11, 2021. The NRC Region 3 inspectors reviewed the report and solicited a peer review by NRC Head Quarters electrical engineering branch. After reviewing the MPR report in detail, both NRC Head Quarters team and the Region 3 team agreed with the MPR report conclusions that potential increase in exciter current while adding manual loads to the EDG after automatic load sequencing, will not damage the exciter components and prevent the EDG from performing its safety function. The NRC inspectors did not identify any violations of more than minor significance. Therefore, this URI is closed.

Corrective Action Reference(s):

- CR 2021-04913, *EDG Overvoltage During Monthly Run*

EXIT MEETINGS AND DEBRIEFS

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

On November 22, 2022, the inspectors presented the triennial fire protection inspection results to Terry Brown, Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Calculations	ARS-DB-11-003	Davis-Besse Non-Power Operational (NPO) Modes Transition Report	6
71111.21N.05	Calculations	ARS-DB-13-071	Davis-Besse General Variances from Deterministic Requirements (VFDR) Report	2
71111.21N.05	Calculations	ARS-DB-13-078	Recovery Actions for Transition Report Attachment G	4
71111.21N.05	Calculations	ARS-DB-15-085	Fire Protection Safe Shutdown NFPA 805 Recovery Action Feasibility Study	0
71111.21N.05	Calculations	ARS-DB-17-112	Fire Risk Evaluation of No. 2 Auxiliary Feedwater Pump Room (F-01)	0
71111.21N.05	Calculations	ARS-DB-19-114	Davis-Besse Fire Protection Safe Shutdown Recovery Action Report	0
71111.21N.05	Calculations	C-EE-002.01-011	Low Voltage Coordination Calculation	7
71111.21N.05	Calculations	C-FP-013.10-018	Davis-Besse Power Station - NFPA 805 Safe Shutdown, Non-Power Operation, and Fire PRA Cable Selection Calculation	1 & A02
71111.21N.05	Calculations	C-FP-013.10-020	Davis-Besse Nuclear Power Station - NUREG / CR-6850 Task 9 - Detailed Circuit Failure Analysis	1
71111.21N.05	Calculations	C-FP-013.10-022	Detailed Fire Modeling - Fire Compartment F-01	1
71111.21N.05	Calculations	C-FP-013.10-045	Fire Compartment E-01, No. 1 Auxiliary Feedwater Pump Room	2
71111.21N.05	Calculations	C-NSA-064.02-032	Davis-Besse Appendix R Overheating Summary Report	1
71111.21N.05	Calculations	C-NSA-064.02-033	Davis-Besse Appendix R Overcooling Summary Report	0 & A01
71111.21N.05	Calculations	FEM-021-01	Turbine Building Elevation 603 Sprinkler System	6
71111.21N.05	Calculations	FEM-021-02	Turbine Building Elevation 603 Sprinkler System	6
71111.21N.05	Calculations	PRA-DB1-17-021	PRA Input to Fire Risk Evaluation for Compartment E-01	3
71111.21N.05	Corrective Action Documents	2005-05472	Fire Protection 5 Year Flow Test Results do not Meet Acceptance Criteria	12/30/2005
71111.21N.05	Corrective Action Documents	2008-40704	Fire Protection 5 Year Flow Test Results do not Meet Acceptable Range for C Value	06/21/2008
71111.21N.05	Corrective Action	2014-12504	Fire Protection: 5-Year Flow Test Results do not Meet	08/01/2014

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents		Acceptable Range for C-Value	
71111.21N.05	Corrective Action Documents	2020-03744	MS5889A Steam Admission to Auxiliary Feed Pump Turbine #1 Valve Dust Boot Separated	04/27/2020
71111.21N.05	Corrective Action Documents	2020-04512	Auxiliary Feed Water Pump 1, PSL106D Failed to Close MS106, MS106A	05/24/2020
71111.21N.05	Corrective Action Documents	2021-00610	Service Water (SW) 1382, Supply to Auxiliary Feed Water Pump (AFP) #1, Stroke Time Outside of Expected Range	01/31/2021
71111.21N.05	Corrective Action Documents	2022-02204	Indications on Welding Around Auxiliary Feed Water Pump Trip (AFPT) #2 Valve Seat	03/15/2022
71111.21N.05	Corrective Action Documents	2022-02209	Indications on Welding Around AFPT #1 Valve Seat	03/15/2022
71111.21N.05	Corrective Action Documents	2022-02236	AFPT 1 Governor DB-ICS38B: Crank Pivot Pin Boss Extends Out of Fulcrum Support Preventing Jam Nut Contact	03/15/2022
71111.21N.05	Corrective Action Documents	2022-05577	Missed Surveillance FP4023-018	08/15/2022
71111.21N.05	Corrective Action Documents	2022-05675	Fire Protection 5-year Flow Test Results do not Meet Acceptable Range for C Value	07/21/2022
71111.21N.05	Corrective Action Documents	2022-05857	2022 Fire Protection Team Inspection Self-Assessment - Performance Monitoring Program	08/26/2022
71111.21N.05	Corrective Action Documents	2022-07575	North Underground Fire Protection Loop Pipe Rupture	10/09/2022
71111.21N.05	Corrective Action Documents	2022-12602	DB-FP-04023 Attachment 25 - Barriers Need Moved to Attachment 45	10/12/2022
71111.21N.05	Corrective Action Documents Resulting from Inspection	2022-07442	2022 Fire Protection Inspection (FPI) - Fire Hazards Analysis Report (FHAR) Contains Incorrect Non Power Operations (NPO) Compliance Summary	10/04/2022
71111.21N.05	Corrective Action Documents Resulting from Inspection	2022-07489	2022 NRC FPI - Fire Protection Expert Software Issue	10/06/2022
71111.21N.05	Corrective Action Documents	2022-07499	2022 NRC Fire Protection Inspection - Fire Protection Piping Corrosion and Coating Degradation	10/06/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Resulting from Inspection			
71111.21N.05	Corrective Action Documents Resulting from Inspection	2022-07920	2022 NRC Fire Protection Inspection: Inaccurate Information Provided in Response to NRC Question	10/19/2022
71111.21N.05	Corrective Action Documents Resulting from Inspection	2022-07930	2022 NRC FPI - Implementation of NPO does not Account for All Key Safety Functions	10/19/2022
71111.21N.05	Drawings	E-44B Sheet 14B	Elementary Wiring Diagram Feed Water System Auxiliary Feed Water Pump (AFP) Discharge to Steam Generator	11
71111.21N.05	Drawings	M-0006D	Auxiliary Feedwater System	60
71111.21N.05	Drawings	M-0007B	Piping & Instrument Diagram Steam Generator Secondary System	63
71111.21N.05	Drawings	M-309AQ-00004-0001	Installation Drawing Modulating Valve Models 87J-001 & 87J-002	0
71111.21N.05	Engineering Evaluations	0200-0213-RPT-001	Evaluation of High Emergency Diesel Generator 1-1 Voltage at Davis-Besse	3
71111.21N.05	Engineering Evaluations	ARS-DB-13-071	Davis-Besse General VFDR Report	2
71111.21N.05	Engineering Evaluations	ARS-DB-17-111	Fire Risk Evaluation of No. 1 Auxiliary Feedwater Pump Room (E-01)	0
71111.21N.05	Engineering Evaluations	ARS-DB-17-112	Fire Risk Evaluation of No. 2 Auxiliary Feedwater Pump Room (F-01)	0
71111.21N.05	Miscellaneous		Fire Hazard Analysis Report	03/31/2021
71111.21N.05	Miscellaneous		Davis-Besse Nuclear Power Station NFPA 805 Nuclear Safety Capability Assessment Report	3
71111.21N.05	Miscellaneous		Davis-Besse 1R22-1: Contingency Plan for Reactor Coolant System (RCS) Drain Below Flange Level and Operation Below 80 Inches Above the RCS Hot Leg Centerline	03/07/2022
71111.21N.05	Miscellaneous		Davis-Besse 1R21-1: Contingency Plan for RCS Drain Below Flange Level and Operation Below 80 Inches Above the RCS Hot Leg Centerline	02/11/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Miscellaneous	ARS-DB-13-071	Davis-Besse General VFDR Report	2
71111.21N.05	Miscellaneous	ATL-2021-0118-ATA-23	DB-1908: NPO Implementation Plan	02/25/2021
71111.21N.05	Miscellaneous	BOP-VT-16-124	Visual Test (VT)-1 of Internal Surfaces: P14-1 Lube Oil Cooler	04/25/2016
71111.21N.05	Miscellaneous	LRAMR-M06	Aging Management Review of the Auxiliary Feedwater and Condensate Storage Systems	7
71111.21N.05	Miscellaneous	OPS-JPM-130	Non-Licensed Operator (NLO), Reactor Operator (RO), Senior Reactor Operator (SRO) - Actions for a Serious Station Fire, Area F	11/11/2006
71111.21N.05	Procedures	DB-FP-00007	Control of Transient Combustibles	7
71111.21N.05	Procedures	DB-FP-00018	Control of Ignition Sources	13
71111.21N.05	Procedures	DB-FP-04035	5 Year Flow Test	07
71111.21N.05	Procedures	DB-OP-02501	Serious Station Fire	24, 26 & 28
71111.21N.05	Procedures	DB-OP-02519	Serious Control Room Fire	21 & 28
71111.21N.05	Procedures	DB-OP-02529	Fire Procedure	12
71111.21N.05	Procedures	DB-OP-02802	Serious Station Fire - Generic Train 2 Affected	00
71111.21N.05	Procedures	DBBP-OPS-1113	Control of Time Sensitive Operator Actions	03
71111.21N.05	Procedures	LRPD-05 Attachment 2.11	Aging Management Program Evaluation Results -One Time Inspection Program	7
71111.21N.05	Procedures	LRPD-05 Attachment 2.8a	Aging Management Program Evaluation Results -Fire Water Program	2
71111.21N.05	Procedures	LRPD-05 Attachment 2.8b	Aging Management Program Evaluation Results -Fire Protection Program	1
71111.21N.05	Procedures	NG-DB-00117	Shutdown Defense in Depth Assessment	20
71111.21N.05	Procedures	NG-DB-00302	DBNPS Fire Protection Program	12
71111.21N.05	Procedures	NOBP-OM-2031	Outage Management Scheduling Process	12
71111.21N.05	Procedures	NOBP-OP-1113	Control of Time Sensitive Operator Actions	2
71111.21N.05	Procedures	NOP-OP-1005	Shutdown Defense in Depth	17
71111.21N.05	Procedures	NOP-OP-1007	Risk Management	37
71111.21N.05	Self-Assessments	ATL-2018-2226-ATA-141	2022 Fire Protection Self Assessment	08/10/2022
71111.21N.05	Work Orders	200759717	FP4035-001 04.000 5 Year Flow Test	07/21/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Work Orders	200761805	FP4023-03104.000 Attachment 8 Barrier Visual Inspection 18 Month	10/03/2021
71111.21N.05	Work Orders	200775095	FP4023-018 04.000 Attachment 25 Barrier Visual Inspection 18 Month	06/28/2022
71111.21N.05	Work Orders	200785600	FP4036-001 04.000 Fire Door 18 Month Inspection	07/23/2021
71111.21N.05	Work Orders	200800008	FP4049-001 05.000 P5-2 Diesel Fire Pump Test	07/21/2022
71111.21N.05	Work Orders	200809818	FP4047-002 05.000 P5-2 Diesel Fire Pump Test	01/19/2022
71111.21N.05	Work Orders	200810087	FP4048-003 04.5.1 P5-1 Electric Fire Pump Lube Oil Sample	12/04/2021
71111.21N.05	Work Orders	200810300	FP4048-002 P5-1 Electric Fire Pump Local	05/22/2022
71111.21N.05	Work Orders	200810301	FP4050-001 04.000 P5-1 Electric Fire Pump Flow Test	09/24/2021
71111.21N.05	Work Orders	200816116	Functional Location DB-T81 Fire Water Storage Tank TK 1-1	04/10/2022
71111.21N.05	Work Orders	200828720	FP4048-004 04.001 P5-1 Electric Fire Pump 15 Minimum Run	07/14/2022
71111.21N.05	Work Orders	200828735	FP4048-001 04.002 P5-1 Electric Fire Pump Remote	09/06/2022
71111.21N.05	Work Orders	200830264	FP4048-003 04.5.1 P5-1 Electric Fire Pump Lube Oil Sample	08/13/2022
71111.21N.05	Work Orders	200831519	FP4047-002 05.000 P5-2 Diesel Fire Pump Test	08/31/2022