April 11, 2002

Mr. Guy Campbell
Vice President - Nuclear, Perry
FirstEnergy Nuclear Operating Company
P. O. Box 97, A200
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT
NRC INSPECTION REPORT 50-440/02-02

Dear Mr. Campbell:

On March 31, 2002, the NRC completed an inspection at your Perry Nuclear Power Plant. The enclosed report documents the inspection findings which were discussed on April 3, 2002, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

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Sincerely,

/RA/

Christine A. Lipa, Chief
Branch 4
Division of Reactor Projects

Docket No. 50-440
License No. NPF-58

Enclosure: Inspection Report 50-440/02-02

See Attached Distribution

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Public Utilities Commission of Ohio
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-440
License No:	NPF-58
Report No:	50-440/02-02
Licensee:	FirstEnergy Nuclear Operating Company (FENOC)
Facility:	Perry Nuclear Power Plant, Unit 1
Location:	P.O. Box 97 A200 Perry, OH 44081
Dates:	February 18, 2002, through March 31, 2002
Inspectors:	Ray Powell, Senior Resident Inspector John Ellegood, Resident Inspector
Approved by:	Christine A. Lipa, Chief Branch 4 Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000440-02-02; on 02/18-03/31/2002; First Energy Nuclear Operating Company; Perry Nuclear Power Plant, Resident Inspection Report.

This report covers a 6-week routine inspection. The inspection was conducted by resident inspectors. No findings of significance were identified during this inspection. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using IMC 0609, "Significance Determination Process" (SDP). The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at: http://www.nrc.gov/NRR/OVERSIGHT/index.html. Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violations.

A. Inspection Findings

No findings of significance were identified.

B. Licensee Identified Violations

No findings of significance were identified.

Report Details

Summary of Plant Status: The plant began the inspection period with Unit 1 at 100 percent power. The unit remained at 100 percent power until February 21, 2002, when the plant reduced power to approximately 70 percent for special testing to identify the approximate location of a leaking fuel rod. After locating the leaking fuel rod, the plant adjusted control rod configuration to insert a control rod to suppress the flux in the leaking fuel rod. Power was returned to 100 percent power on February 28. Aside from periodic power reductions to support surveillances, the plant remained at 100 percent power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R04 Equipment Alignment (71111.04Q)

.1 Division 2 Emergency Diesel Generator (EDG)

a. Inspection Scope

The inspectors conducted a partial alignment walkdown of the Division 2 EDG, a risk significant system, to evaluate its readiness while the Division 1 train was out of service for planned maintenance. The inspectors used licensee valve lineup instructions (VLIs) during the walkdown and used selected portions of system electrical, fuel oil, lubricating oil, and starting air drawings to accomplish the inspection. The walkdown included selected switch and valve position checks, review of associated effective operating procedures, and verification of electrical power to critical components. Finally, the inspectors evaluated other elements, such as material condition, housekeeping, and component labeling. The documents used for the walkdown are listed in the attached List of Documents Reviewed.

b. Findings

No findings of significance were identified.

.2 Reactor Core Isolation System (RCIC)

a. Inspection Scope

The inspectors conducted a partial alignment walkdown of the RCIC system, a risk significant system, to evaluate its readiness while the High Pressure Core Spray (HPCS) system was declared inoperable due to the problems associated with the condensate storage tank suction check valve. The inspectors used licensee VLIs and system drawings during the walkdown. The walkdown included selected switch and valve position checks and verification of electrical power to critical components. Finally, the inspectors evaluated other elements, such as material condition, housekeeping, and

component labeling. The documents used for the walkdown are listed in the attached List of Documents Reviewed.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05Q)

a. Inspection Scope

The inspectors walked down the following areas to assess the overall readiness of fire protection equipment and barriers:

- Fire Areas ESW-1a and ESW-1b, Emergency Service Water (ESW) Pumphouse
- Fire Area 1CC-3a, Division 2 Switchgear Room

Emphasis was placed on the control of transient combustibles and ignition sources, the material condition of fire protection equipment, and the material condition and operational status of fire barriers used to prevent fire damage or propagation.

The inspectors looked at fire hoses, sprinklers, and portable fire extinguishers to verify that they were installed at their designated locations, were in satisfactory physical condition, and were unobstructed. The inspectors also evaluated the physical location and condition of fire detection devices. Additionally, passive features such as fire doors, fire dampers, and mechanical and electrical penetration seals were inspected to verify that they were in good physical condition. The documents listed at the end of the report were used by the inspectors during the assessment of this area.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12Q)

a. Inspection Scope

The inspectors reviewed the licensee's implementation of the maintenance rule requirements to verify that component and equipment failures were identified and scoped within the maintenance rule and that select structures, systems and components were properly categorized and classified as (a)(1) or (a)(2) in accordance with 10 CFR 50.65. The inspectors reviewed station logs, maintenance work orders, selected surveillance test procedures, and a sample of Condition Reports (CRs) to verify that the licensee was identifying issues related to the maintenance rule at an appropriate threshold and that corrective actions were appropriate. Additionally, the inspectors reviewed the licensee’s performance criteria to verify that the criteria adequately monitored equipment performance and to verify that licensee changes to performance criteria were reflected in the licensee’s probabilistic risk assessment. During this inspection period, the inspectors reviewed:

- Emergency Closed Cooling Water (ECCW) System
- Fuel System
- HPCS

The problem identification and resolution CRs reviewed are listed in the attached List of Documents Reviewed.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, configuration control, and performance of maintenance associated with planned and emergent work activities, to verify that scheduled and emergent work activities were adequately managed. In particular, the inspectors reviewed the licensee's program for conducting maintenance risk assessments to verify that the licensee's planning, risk management tools, and the assessment and management of on-line risk were adequate. The inspectors also reviewed licensee actions to address increased on-line risk when equipment was out-of-service for maintenance, such as establishing compensatory actions, minimizing the duration of the activity, obtaining appropriate management approval, and informing appropriate plant staff, to verify that the actions were accomplished when on-line risk was increased due to maintenance on risk-significant structures, systems, and components. The following specific activities were reviewed:

- The maintenance risk assessment for work planned for the week beginning February 25, 2002. This included work involving adjustment of the Division 1 EDG govenor and subsequent post maintenance testing.

- The maintenance risk assessment for work planned for the week beginning March 11, 2002. The work week included planned HPCS unavailability for capacitor replacement and post-maintenance testing. The inspectors also reviewed the additional activities added to the week due to emergent problems associated with the HPCS condensate storage tank suction check valve.

- The maintenance risk assessment for work planned for the week beginning March 25, 2002. The work week included planned RCIC unavailability for train outage activities and post-maintenance testing.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors selected CRs related to potential operability issues for risk significant components and systems. These CRs were evaluated to determine whether the operability of the components and systems was justified. The inspectors compared the operability and design criteria in the appropriate sections of the Technical Specifications (TSs) and Updated Safety Analysis Report (USAR) to the licensee's evaluations to verify that the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors verified that the measures were in place, would work as intended, and were properly controlled. Additionally, the inspectors verified, where appropriate, compliance with bounding limitations associated with the evaluations. The inspectors reviewed:

- the licensee's evaluation of the potential loss of ECCW inventory during isolation of the Nuclear Closed Cooling System due to time-delay relay tolerances on ECCW operability
- the licensee's evaluation of the impact of the failure of the ESW pump 'A' discharge vacuum breaker on ESW operability
- the licensee's evaluation of the failure of the 'A' train of heating, ventilation, and cooling for the divisional batteries and switchgear rooms on battery and switchgear operability

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors evaluated the following post-maintenance testing activities for risk significant systems to assess the following (as applicable): the effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed; acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate; tests were performed as written; and equipment was returned to its operational status following testing. The inspectors evaluated the activities against TS, the USAR, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications. In addition, the inspectors reviewed CRs associated with post-maintenance testing to determine if the licensee was identifying problems and entering them in the corrective action program. The specific procedures and CRs reviewed are listed in the attached List of Documents Reviewed. The specific post-maintenance activities evaluated included:

- Division 1 Diesel Generator Load Reject Test following planned maintenance on the diesel govenor

- Reactor Pressure Vessel Low Level 3 and High Level 8 Reactor Protection System/ Residual Heat Removal Shutdown Isolation Logic Testing following agastat relay replacement
- HPCS System Flow Rate Low Channel Calibration and Functional Check following capacitor replacement

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed surveillance testing or reviewed test data for risk-significant systems or components to assess compliance with TS, 10 CFR Part 50 Appendix B, and licensee procedure requirements. The testing was also evaluated for consistency with the USAR. The inspectors verified that the testing demonstrated that the systems were ready to perform their intended safety functions. The inspectors reviewed whether test control was properly coordinated with the control room and performed in the sequence specified in the surveillance instruction, and if test equipment was properly calibrated and installed to support the surveillance tests. The procedures reviewed are listed in the attached List of Documents Reviewed. The specific surveillance activities assessed included:

- Control Rod Exercises
- ESW Pump A and Valve Operability Test
- RCIC System Flow Monitoring Test

b. Findings

No findings of significance were identified.

1EP6 Drill Evaluation (71114.06)

a. Inspection Scope

The inspectors observed the control room simulator, the technical support center, and the emergency offsite facility during an emergency preparedness drill conducted on March 20, 2002. The inspection focused on the ability of the licensee to appropriately classify emergency conditions, complete timely notifications, and implement appropriate protective action recommendations in accordance with approved procedures.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator (PI) Verification (71151)

a. Inspection Scope

The inspectors reviewed reported fourth quarter 2001 data for the High Pressure Injection System Unavailability PI using the definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Indicator Guideline," Revision 2. The inspectors reviewed station logs, monthly safety system unavailability hour logs, and selected surveillance procedures to verify the accuracy of the licensee's data submission.

b. Findings

The inspectors determined that the licensee's use of managed restoration instructions during safety system surveillance testing was not consistent with the guidance provided in NEI 99-02. The NRC endorsed guidance provided criteria for excluding planned unavailable hours during testing, including:

- the test configuration is automatically overridden by a valid start signal or the function can be promptly restored either by an operator in the control room or by a dedicated operator stationed locally for that purpose
- restoration actions must be contained in a written procedure, must be uncomplicated (a single action or a few simple actions), and must not require diagnosis or repair
- credit for a dedicated local operator can only be taken if they are positioned at the proper location throughout the duration of the test for the purpose of restoration

As stated in NEI 99-02, the purpose of the guidance was to allow licensees to take credit for restoration actions that are virtually certain to be successful during accident conditions. The guidance did, however, caution that under stressful chaotic conditions simple multiple actions may not be accomplished with virtual certainty.

The inspectors reviewed the restoration instructions provided in licensee surveillance procedures SVI-E22-T1200, "HPCS Pump Discharge Pressure - High (Bypass) Channel Functional For 1E22-N651," Rev. 3 and SVI-E22-T1202, "HPCS System Flow Rate - Low (Bypass) Channel Functional For 1E22-N656," Rev. 3 against the NEI 99-02 guidance. Both procedures required the installation of an instrumentation and control (I&C) calibration unit and the racking out of the HPCS pump breaker. Accordingly, restoration actions were required by an I&C technician, a plant operator at the HPCS pump breaker, and a control room operator. Actions by the control room operator and the plant operator at the pump breaker were procedurally required to be coordinated to prevent an inadvertant pump start during the transient response due to the restoration activities.

The inspectors identified that the restoration instructions contained several deviations from the NEI 99-02 guidance, specifically:

- NEI 99-02 required that the safety function be promptly restored. The inspectors noted that, as stated in the restoration instructions, the licensee considers a safety system to be available if the safety function can be restored within 10 minutes of the control room order to do so. The inspectors acknowledged that the guidance does not quantify "prompt," but concluded that 10 minutes was in excess of reasonable bounds.
- NEI 99-02 required that dedicated operators be stationed locally throughout the duration of the test. The licensee's procedures required the operators to be "in the vicinity."
- NEI 99-02 required restoration actions to be uncomplicated (a single action or a few simple actions). The inspectors observed that the licensee's restoration instructions were four pages in length, contained eight notes and two caution statements, and required actions at three separate locations including coordinated actions by two of the stations. The inspectors concluded the restoration actions did not meet the intent of the NEI 99-02 "uncomplicated" requirement.
- NEI 99-02 required restoration actions to be virtually certain of success. The inspectors determined that the licensee's restoration actions, performed during the initial stages transient response, did not have a success probability nearly equal to one and therefore did not meet the "virtually certain" criteria.

The inspectors concluded that time spent in the testing configuration required by SVI-E22-T1200 and SVI-E22-T1202 should have been reported to the NRC as planned safety system unavailability hours. The inspectors reviewed the issue with licensee management and concluded that the restoration approach used in SVI-E22-T1200 and SVI-E22-T1202 was not unique to those procedures. Since the number of procedures, and systems, affected by the misapplication of NEI 99-02 guidance has yet to be determined, the inspectors could not yet determine if a performance indicator threshold would have been crossed. As a result, the inspectors considered this issue an Unresolved Item (URI) (URI 50-440/02-02-01). The licensee has entered the issue in their corrective action program as CR 02-0946.

4OA6 Meetings

Exit Meeting

The inspectors presented the inspection results to Mr. Guy Campbell, Site Vice President and other members of licensee management at the conclusion of the inspection on April 3, 2002. The licensee acknowledged the findings presented. No proprietary information was identified.

KEY POINTS OF CONTACT

Licensee

G. Campbell, Vice President-Nuclear
B. Boles, Operations Manager
G. Dunn, Manager, Regulatory Affairs
D. Gudger, Supervisor, Compliance
T. Lentz, Manager, Design Engineering
K. Ostrowski, Director, Nuclear Services Department
D. Phillips, Manager, Plant Engineering
T. Rausch, Director, Nuclear Maintenance Department
W. Kanda, General Manager, Nuclear Power Plant Department
R. Strohl, Superintendent, Plant Operations

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-440/02-02-01	URI	Safety System Unavailability Hours During Surveillance Testing

Closed

None

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
CR	Condition Report
ECCW	Emergency Closed Cooling Water
EDG	Emergency Diesel Generator
ESW	Emergency Service Water
FENOC	FirstEnergy Nuclear Operating Company
HPCS	High Pressure Core Spray
I&C	Instrumentation and Control
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
PI	Performance Indicator
RCIC	Reactor Core Isolation Cooling
SDP	Significance Determination Process
SVI	Surveillance Instruction
TS	Technical Specifications
URI	Unresolved Item
USAR	Updated Safety Analysis Report
VLI	Valve Lineup Instruction

LIST OF DOCUMENTS REVIEWED

1R04 Equipment Alignment

Drawing 302-0352	Standby Diesel Generator Fuel Oil System	March 15, 2001
VLI-R45	Division 1 & 2 Diesel Generator Fuel Oil System (Unit 1), Rev. 4	May 23, 1995
Drawing 302-0351	Standby Diesel Generator Starting Air, Rev. W	July 27, 2000
VLI-R44	Division 1 & 2 Diesel Generator Starting Air System (Unit 1), Rev. 4	June 8, 1988
Drawing 302-0353	Standby Diesel Generator Lube Oil Sys, Rev. P	July 27, 2000
VLI-R47	Division 1 & 2 Diesel Generator Lube Oil System (Unit 1), Rev. 4	March 3, 1989
Drawing 302-0354	Standby Diesel Generator Jacket Water System, Rev. P	July 27, 2000
VLI-R46	Division 1 & 2 Diesel Generator Jacket Water System (Unit 1), Rev. 3	March 2, 1989
VLI-E51	Reactor Core Isolation Cooling System (Unit 1), Rev. 3	September 27, 1988
Drawing 302-0631	Reactor Core Isolation Cooling System, Rev. Z	March 22, 2001

1R05 Fire Protection

Drawing E-023-034	Fire Protection Evaluation - Units 1 and 2 Emergency Service Water Pumphouse - Plans and Sections	March 1991
Drawing D-926-005	Emergency Service Water Pump House Floor, Equipment and Roof Drains	March 27, 1978
Drawing E-023-011	Fire Protection Evaluation - Units 1 and 2 Control Complex and Diesel Generator Building Plan - El. 620'-6"	September 2001
USAR Section 9A.4.4.3.1.1	Fire Area 1CC-3a	
USAR Section 9A.4.6.1	Fire Area ESW-1a	
USAR Section 9A.4.6.2	Fire Zone ESW-1b	
CR 02-0872	Concern Regarding Functionality of ESW Pump House Floor Drains	March 21, 2001

1R12 Maintenance Rule Implementation

CR 01-0261	Loose Middle Bolt on Snubber Clamp	January 24, 2001
CR 01-0430	ECC A Controller Found in Manual	February 6, 2001
CR 01-0817	PTI-P42-P0010 Loop 'A' System Leakage	February 24, 2001
CR 01-1715	ECC-B Surge Tank Valve 1P42-F0668 Out of Position	April 2, 2001
CR 01-2684	Relief Valve Removed From 0P42F543C Failed As-Found Testing	July 10, 2001
CR 01-3359	Offgas Noble Gas Sample Results Have Increased Since the End of August	September 18, 2001
CR 01-4171	Latent Issues Review - P42 - ECCW to NCCW Leakage	December 4, 2001
CR 01-4257	Latent Issue Review Recommendations	December 13, 2001
CR 02-0421	Xe 133 Increased on Off Gas Pretreatment Sample	February 9, 2002
CR 02-0500	Xe-133 Value Following Down Power Was Greater Than Established Criteria	February 17, 2001
CR 02-0570	Investigations for Having Control Rod 18-15 For Remainder of Cycle	February 25, 2002
System Health Report	Emergency Closed Cooling Water System Status Report	1st Quarter 2001
System Health Report	Emergency Closed Cooling Water System Status Report	2nd Quarter 2001
System Health Report	Emergency Closed Cooling Water System Status Report	3rd Quarter 2001
System Health Report	Emergency Closed Cooling Water System Status Report	4th Quarter 2001
System Health Report	Fuel System Status Report	1st Quarter 2001
System Health Report	Fuel System Status Report	2nd Quarter 2001
System Health Report	Fuel System Status Report	3rd Quarter 2001
System Health Report	Fuel System Status Report	4th Quarter 2001

System Health Report	High Pressure Core Spray System Status Report	1st Quarter 2001
System Health Report	High Pressure Core Spray System Status Report	2nd Quarter 2001
System Health Report	High Pressure Core Spray System Status Report	3rd Quarter 2001
System Health Report	High Pressure Core Spray System Status Report	4th Quarter 2001
PAP-1125	Monitoring the Effectiveness of the Maintenance Program Plan, Rev. 6	April 4, 2001
Logs	Plant Narrative Logs	01/01/01 - 3/31/02
NUMARC 93-01, Revision 2	Nuclear Energy Institute Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants	

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

	Week 2, Period 5 Forecast Risk Profile	February 25, 2002
	Week 4, Period 5 Forecast Risk Profile	March 11, 2002
	Week 6, Period 5 Forecast Risk Profile	March 25, 2002
CR 01-4213	DG Load Reject Assessment for Electrical System Perturbations	December 10, 2001
Calculation PSA-010	Diesel Load Reject Test - Relative Risk Evaluation	December 18, 2001
SVI-R43-T1327	Division 1 Standby Diesel Generator Functional Test, Rev. 5	February 13, 2001
PAP 1924	On-Line Safety Assessment and Configuration Risk Management, Rev. 2	November 30, 2000

1R15 Operability Evaluations

CR 01-4171	Latent Issues Review - P42 - ECCW to NCCW Leakage	December 4, 2001
CR 02-0568	ESW A Pump Vacuum Breaker 1P45F0502A Not Seating With Pump Running	February 25, 2002
CR 02-0840	Degraded Hydomotor 0P47F0045A Has Failed	March 20, 2002
TS 3.7.1	Emergency Service Water Systems, Divisions 1 and 2	

TS 3.7.10	Emergency Closed Cooling Water System	

1R19 Post-Maintenance Testing

SVI-B21-T0034-A	RPV Low Level 3 and High Level 8 PRS/RHR Shutdown Isolation, Rev. 4	December 5, 1990
Problem Solving Plan Summary	Agastat Relay Testing Methodology in Question	March 20, 2002
CR 02-0686	Senior Resident Query	March 8, 2002
CR 02-0828	Test Methodology For Replacement of Safety Related Relays	March 19, 2002
SVI-R43-T1317	Diesel Generator Start and Load Division 1, Rev. 9	December 6, 2000
SVI-R43-T1327	Division 1 Standby Diesel Generator Functional Test, Rev. 5	February 13, 2001
SVI-E22-T1202	HPCS System Flow Rate - Low (Bypass) Channel Functional For 1E22-N656, Rev. 3	December 4, 1989
WO 00-002900-000	Capacitor C25 Suspect to Failure	
WO 01-017499	Replace Normally Energized Agastat Relays 1C71A-K006A, 1C71A-K046A, and 1C71A-K044A During Performance of Surveillance Instruction SVI-B21-T0034-A	
WO 01-013637-000	Readjust (Fine Tune) EGA Govenor Dynamics For Div 1 DG For Optimum Performance	

1R22 Surveillance Testing

SVI-C11-T1003-A	Control Rod Exercise (Part 1), Rev. 3	March 27, 2001
SVI-P45-T2001	ESW Pump A and Valve Operability Test, Rev. 4	
SVI-E51-T0339	RCIC System Flow (Remote Shutdown Monitoring) Channel Calibration for 1E51-N003, Rev. 2	November 6, 1992
TS 3.1.3	Control Rod Operability	
TS 3.7.1	Emergency Service Water Systems, Divisions 1 and 2	

1EP6 Drill Evaluation

	Perry Nuclear Power Plant Emergency Preparedness Drill Scenario	March 20, 2002

4AO1 Performance Indicator Verification

NEI 99-02	Regulatory Assessment Performance Indicator Guideline, Rev. 2	November 2001
Logs	Plant Narrative Logs	01/01/01 - 12/31/01
Logs	Monthly Safety System Unavailability Logs	January-June, 2001
CR 02-0946	NRC Concern On Perry's Use of Managed Restoration As It Relates To The PI's	March 28, 2002
SVI-E22-T1200	HPCS Pump Discharge Pressure - High (Bypass) Channel Functional For 1E22-N651, Rev. 3	December 4, 1989
SVI-E22-T1202	HPCS System Flow Rate - Low (Bypass) Channel Functional For 1E22-N656, Rev. 3	December 4, 1989
SVI-E22-T2001	HPCS Pump and Valve Operability Test, Rev. 10	February 16, 2001