ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W North Temple, Suite 330
Salt Lake City, Utah 84114

December 10, 2020

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 20-035-01**
Application to Increase the Deferred Rate through the Energy Balancing Account Mechanism
Rocky Mountain Power Response Testimony

In accordance with the Scheduling Order and Notice of Hearing issued by the Utah Public Service Commission ("Commission") on March 31, 2020, PacifiCorp, d.b.a. Rocky Mountain Power, hereby submits for electronic filing its response testimony in the above referenced matter.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
jana.saba@pacificorp.com
emily.wegener@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward
Vice President, Regulation

cc: Service List – Docket No. 20-035-01

CERTIFICATE OF SERVICE

Docket No. 20-035-01

I hereby certify that on December 10, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

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ocs@utah.gov	

Division of Public Utilities

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Katie Savarin
Coordinator, Regulatory Operations

Rocky Mountain Power
Docket No. 20-035-01
Witness: David G. Webb

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Response Testimony of David G. Webb

December 2020

Q. Are you the same David G. Webb who submitted direct testimony on behalf of PacifiCorp, d/b/a Rocky Mountain Power ("the Company") in this proceeding?

A. Yes.

Q. What is the purpose of your response testimony?

A. My testimony responds to certain issues raised by the Utah Division of Public Utilities ("Division") in its energy balancing account ("EBA") Audit Report and by Daymark Energy Advisors ("Daymark"), on behalf of the Division.

Q. Are any other Company witnesses filing testimony in response to issues raised by the Division and Daymark?

A. Yes. Company witness Mr. Dana M. Ralston provides testimony responding to the proposed adjustments related to the four generating plant outages.

REPLACEMENT POWER COSTS

Q. Please describe the proposed adjustment for generating plant outages.

A. Daymark recommends reducing net power costs from the EBA by $2,792,525 on a Utah allocated basis attributed to four plant outages, which it claims were imprudent.[1] This adjustment consists of $2,617,430 for the replacement power costs and $175,095 in interest.

Q. How does the Company respond to Daymark's proposed adjustments related to these four outages?

A. The Company accepts Daymark's proposed adjustment with respect to the Wyodak outage, but does not accept the adjustment for the other three outages. Company witness Mr. Ralston responds to Daymark's recommendation and provides support and

[1] Also includes $21,822 related to the update of the system overhead factor.

detailed testimony for the Company's position that plant operations were prudent and other than the Wyodak outage, the proposed adjustments are without merit. Additionally, the Company accepts Daymark's calculation of the Wyodak replacement power costs to be deducted from the requested EBA. This reduction is $47,568 on a Utah allocated basis which includes $43,962 for replacement power costs and $3,606 in interest.

Q. Notwithstanding the Company's objection to the remaining proposed adjustments, does the Company agree with Daymark's calculation of the replacement power costs?

A. Yes. The methodology used by Daymark to calculate the replacement power costs is reasonable.

INCREMENTAL NON-FUEL FAS 106 SAVINGS

Q. Please describe the adjustment to the Incremental Non-Fuel FAS 106 Savings proposed by the Division.

A. The Incremental Non-Fuel FAS 106 Savings is related to the settlement of the Deer Creek Retiree Medical Obligation and the resulting reduced expense. This expense reduction is allocated to Utah using the SO allocation factor. In its initial filing, the Company used the SO factor for the 12 months ended June 30, 2019 from the Results of Operations report. As with prior years, the Division recommends updating the Utah allocation of the cost savings by using the calendar year 2019 SO allocation factor which is now available. This adjustment reduces the Company's requested recovery in the EBA by $21,822.

Q. Does the Company accept the Division's update to the Incremental Non-Fuel FAS 106 Savings to use the 2019 SO allocation factor?

A. Yes.

Q. Does the Company agree with the Division's characterization of this adjustment as an error?

A. Division witness Mr. Gary Smith's direct testimony inaccurately states that this correction is an error when instead it is merely an update using the final 2019 SO allocation factor that was not available at the time of the initial EBA filing in March 2020. The Company will continue to use the appropriate and most recently available allocation factors in future filings where applicable. Due to the general rate case in Docket No. 20-035-04, the Company will no longer need to update the SO allocation factor for the Deer Creek Retiree Medical Obligation settlement because the remaining Deer Creek components will become part of base rates.

TRADE PURPOSE DOCUMENTATION

Q. Please summarize the Division's concerns related to the trade purpose documentation.

A. The Division notes their concern with the Company's trade purpose documentation, specifically its Commercial Objective Reports that are provided through discovery to support net power costs.

Q. What is the Company's response?

A. Representatives from the Company met with the Division on November 30, 2020 to discuss their concerns, and the Company is working to address its processes to provide the adequate documentation going forward as to why specific transactions occurred.

Because these process changes are being made now and on a going forward basis, there will only be a limited timeframe during the 2020 deferral period that the revised documentation will be available.

Q. Does this conclude your response testimony?

A. Yes.

REDACTED
Rocky Mountain Power
Docket No. 20-035-01
Witness: Dana M. Ralston

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

REDACTED
Response Testimony of Dana M. Ralston

December 2020

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Rocky Mountain Power (the "Company").

A. My name is Dana M. Ralston. My business address is 1407 West North Temple, Suite 210, Salt Lake City, Utah 84116. My title is Senior Vice President of Thermal Generation and Mining.

QUALIFICATIONS

Q. Briefly describe your education and professional experience.

A. I have a Bachelor of Science Degree in Electrical Engineering from South Dakota State University. I was previously the Vice President of Coal Generation and Mining from March 2015 to November 2017, and Vice President of Thermal Generation from January 2010 to March 2015. For 29 years before that, I held a number of positions of increasing responsibility within Berkshire Hathaway Energy's generation organizations, including the plant manager position at the Neal Energy Center. In my current role, I am responsible for operating and maintaining PacifiCorp's coal and natural gas-fired generation fleet, coal fuel supply, and mining.

Q. Have you testified in previous regulatory proceedings?

A. Yes. I have filed testimony on behalf of the Company in proceedings before the Utah Public Service Commission ("Commission") and public utility commissions in California, Oregon, Washington, and Wyoming.

PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony in this case?

A. My testimony responds to the direct testimonies of Mr. Philip DiDomenico and Mr. Dan F. Koehler of Daymark Energy Advisors, Inc. ("Daymark") who submitted

testimony and exhibits on behalf of the Division of Public Utilities ("DPU" or "Division").

Q. To what issues raised by Daymark in its testimony do you wish to respond?

A. My testimony addresses the recommendations contained in DPU Confidential Exhibit 2.3 to disallow recovery of approximately $2.8 million in replacement power costs related to four separate outages in 2019 from the deferred EBA costs.

Q. Please list the specific generating units and 2019 outages being discussed.

A. The outages in question occurred at:

1. Dave Johnston Unit 1, on February 18, 2019
2. Hunter Unit 3, on July 29, 2019
3. Lake Side 2 Unit 3, on August 18, 2019
4. Wyodak Unit 1, on June 6, 2019

Q. Is the Company accepting any of the adjustments proposed by Daymark related to these outages?

A. Yes. After reviewing the testimony, the Company accepts Daymark's proposed adjustment related to the Wyodak Unit 1 outage on June 6, 2019. My testimony demonstrates that the Company acted prudently with respect to the other outages in question and the Commission should reject the proposed adjustments.

DAVE JOHNSTON UNIT 1 (February 18, 2019)

Q. Please describe the outage at Dave Johnston Unit 1.

A. On February 18, Dave Johnston Unit 1 was removed from service due to boiler draft issues. The draft issue was corrected, but the unit remained offline while personnel investigated and worked to repair leaking seals on the 1B boiler feed pump ("BFP").

Inspection of the failed 1B BFP revealed that the internal volutes (the casing that receives the fluid being pumped by the impeller) had been installed backwards by a contractor in 2018, while the BFP was offsite at the contractor's facility.

Q. What is Daymark's rationale for the proposed disallowance related to this outage?

A. On page 29 of DPU Confidential Exhibit 2.3 Daymark concludes that the circumstance "suggests a lack of proper vetting and oversight of the contractor."[1]

Q. Can you please explain what qualifications the contractor demonstrated in order to perform the required maintenance?

A. The contractor who performed the maintenance was the Original Equipment Manufacturer ("OEM") of the BFP for this unit. Furthermore, this contractor possesses technical expertise of the BFP and has supported the maintenance requirements of these pumps with no prior issues.

Q. Could additional oversight by the plant personnel have prevented the backwards installation of the volutes?

A. The BFP was shipped offsite to the OEM's facility where the BFP overhaul, including installation of the volutes (internal to the BFP), was performed by the OEM. The pump components were reassembled by the OEM before being returned, and the internal position of the improperly installed volutes would not have been visually identifiable by plant personnel after arriving at the plant. Furthermore, the Company hired the OEM as the contractor for this project because these specific tasks were outside the technical expertise of plant personnel, and the OEM is the technical expert on these pumps.

[1] DPU Confidential Exhibit 2.3 - Daymark Energy Advisors EBA Audit Report for Calendar Year 2019 page 29.

Q. How do you respond to the recommended disallowance for this outage?

A. The Company hired a fully qualified contractor, the OEM, to perform a technical task that was outside the expertise of the plant maintenance personnel. The OEM manufactured the BFP and is qualified to perform the specific pump maintenance. The Company has had successful results with the OEM's prior work performance and the accuracy of the scope of work performed. Due to the failed pump and follow up inspection, the Company recognized that there were challenges with the OEM and specifically the volute installation. This unsatisfactory performance led the Company to select a different qualified contractor for future maintenance and repair work on the BFP. The Company acted prudently in following the OEM's maintenance guidelines, using the OEM to conduct required maintenance on the BFP, and challenging the OEM's performance and obtaining a discount on the invoice[2] when the mistake in installing the volutes became apparent.

HUNTER UNIT 3 (July 29, 2019)

Q. Please describe the background of the Hunter Unit 3 outage.

A. On July 29, 2019 Hunter Unit 3 was brought offline to repair a reheater tube leak. The subsequent inspection identified that the rate of wear on upper portions of the vertical reheater (pendent) assemblies had accelerated which caused boiler tube leaks.

Q. What is Daymark's stated understanding?

A. Daymark states, "the need for a broadscale replacement of tubes in the reheater was first identified in 2013 at which time the Company decided to make extensive repairs in 2016 and defer full replacement till 2024."[3] This statement does not accurately reflect

[2] RMP Response to DPU 4.4(a).
[3] DPU Confidential Exhibit 2.3 - Daymark Energy Advisors EBA Audit Report for Calendar Year 2019 page 29.

the sequence of events. To clarify, my testimony is accompanied by three exhibits – Exhibit RMP___(DMR-1), Exhibit RMP___(DMR-2), and Exhibit RMP___(DMR-3), which provide information on the Company's decision-making process. Exhibit RMP___(DMR-1) is the 2012 inspection report of the vertical reheater and shows there were no broadscale issues with this section of the boiler at that time. Exhibit RMP___(DMR-2) is the 2013 inspection report of the vertical reheater during a forced outage in January of 2013. The results of the inspection show that the tubes were in good condition and no immediate repairs or concerns were identified. Based on information the Company had at the time (2013) as well as its knowledge and experience with Hunter Unit 3, a full replacement of the reheater was added to planned capital expenditures to occur during calendar year 2024 for approximately $4.3 million.

Q. Did the Company continue to monitor this area of the boiler?

A. Yes. The reheater was inspected again in 2016 during a scheduled overhaul, which included the general area where the tube leak occurred that later caused the July 29, 2019 outage. Exhibit RMP___(DMR-3) provides the 2016 inspection report that shows the area needed some minor repairs but was in acceptable condition. Ultimately, as a result of the unexpected wear between the inspection conducted during the 2016 overhaul and the 2019 forced outage, the Company developed a project to address the damaged tubing in the upper portions of the vertical reheater (pendent) section during the planned outage for the 2020 overhaul.

Q. Was the 2020 project to address the damaged tubing in the upper portions of the vertical reheater section an acceleration of the 2024 planned full replacement of the reheater as stated by Daymark?

A. No. This project was a replacement of a specific section of the vertical reheater (pendent) to address the unexpected wear, not a full replacement. The 2020 project costs were approximately $627,000 and the 2024 project was budgeted, as stated above, for approximately $4.3 million. The scopes of the two projects are significantly different. Due to the benefits from the 2020 project, the Company has moved the forecasted 2024 project back to 2028, not moved up as Daymark states.

Q. What is the premise for Daymark's recommended disallowance related to the Hunter Unit 3 outage?

A. On page 30 of DPU Confidential Exhibit 2.3 it states that, "The Company has provided no evidence of quantitative analysis justifying the decision to delay replacement of the reheater to 2024 despite ample evidence of a broadscale problem in 2013."[4]

Q. How do you respond to this recommendation?

A. The Company did not delay the replacement of the reheater. The 2013 inspection did not indicate that the reheater assembly was at the end of its useful life. Rather, as explained above, it showed that the tubes were in good condition and identified no need for an immediate broadscale replacement or major repair. Based on the inspection and Company's knowledge and experience with Hunter 3, it was prudent to budget a future replacement of the reheater for 2024.

[4] DPU Confidential Exhibit 2.3 - Daymark Energy Advisors EBA Audit Report for Calendar Year 2019 page 30.

Q. What is your recommendation to the Commission with respect to the Hunter 3 adjustment proposed by Daymark?

A. I recommend that the Commission reject the adjustment proposed by Daymark. The Company acted prudently through ongoing monitoring and targeted replacement of reheater sections of concern to help ensure equipment life was maximized at reduced costs instead of an unnecessary costly wholesale replacement of the entire reheater.

Lake Side 2 Unit 3 Outage (August 18, 2019)

Q. Please summarize the event that occurred at the Lake Side plant on August 18, 2019.

A. On August 18, 2019, the Lake Side Block 2 Steam Turbine Generator ("STG") tripped offline due to an 86G Generator protection lockout relay. The unit had both the Schweitzer 300G and 487E differential trips activate along with 64G-1 & G-2 (stator fault elements). Unit data logs indicated the generator 'A' phase current reached 56,000 amps, which is approximately 5 times the unit rating. Based on the information reviewed from the 300G relay and stator ground fault elements, the plant personnel initiated an assessment into the physical condition of the unit. Further analysis of the overall differential protection relays appeared to indicate the unit experienced a three-phase fault. Personnel also noted a strong burnt electrical smell in the immediate area of the generator after this event occurred. The plant contacted the original equipment manufacturer ("OEM"), Siemens, to assist with the investigation, inspections, and disassembly. Electrical testing and visual examination confirmed that an electrical fault had occurred and melted a portion of the generator stator core beyond repair.

Q. Was an official root cause analysis (RCA) completed on the failure?

A. Yes. Siemens completed an in-depth RCA of the failure that was ultimately inconclusive.

Q. Was the Company or the OEM able to determine the root cause for the outage?

A. No. The Siemens Root Cause Analysis ("RCA") was inconclusive and no definitive root cause has been identified. Siemens evaluated [redacted] potential failure scenarios and all were either "Eliminated" or considered "Low Probability" to the root cause. The RCA did not find any occurrence of improper operation or maintenance, poor workmanship, foreign material, or signs of previous damage that would cause the failure. The [redacted] potential failure scenarios the RCA evaluated, included work completed inside the generator. None of the results indicated that any foreign objects were found or that foreign material prevention, tracking or exclusion procedures detected any issues. Daymark states "the Company has yet to offer a final determination of the root cause of this event."[5] As stated above, the results of the detailed RCA were inconclusive due to the fact that none of the evidence could conclusively determine a defined cause.

Q. Has the Company taken additional steps to determine the cause of the Lake Side 2 outage?

A. Yes. Due to the significance of the event and the fact that the Company owns two other generators of the same design, the Company hired and is working with a neutral third-party contractor to perform an additional RCA investigation in pursuit of a root cause. This report is expected to be completed by end of 2020, and the preliminary results indicate no different conclusions from the Siemens RCA.

[5] DPU Confidential Exhibit 2.3 – Daymark Energy Advisors EBA Audit Report for Calendar Year 2019, page 30.

Q. How do you respond to Daymark's comments regarding the timeliness of RCA production?

A. After the Lake Side event occurred, plant management prioritized working with the OEM to complete an RCA of the failure and returning the unit to service. As previously described, this initial RCA was completed and ultimately inconclusive as to the root cause. This RCA was made available to the DPU through discovery on June 22, 2020. The Company also voluntarily undertook a second RCA, even though it was not required. The amount of time required to perform RCA's is often dictated by experts, scale of event, complexity of the analysis process, information gathering, etc. and as an added challenge specific to this year, the COVID-19 pandemic. The fact that the second RCA has been delayed past the original projected finish time does not demonstrate a lack of prudence on the Company's part.

Q. Was the Company prudent in its operation of the Lake Side plant?

A. Yes. The Company has demonstrated that it has operated, maintained, and acted prudently with respect to Lake Side by: 1) operating the unit within design; 2) following OEM recommendations; 3) providing oversight and being engaged with Siemens during maintenance activities; 4) using the OEM experts on this equipment to perform maintenance; and 5) following FME policies and procedures for both the Company and the OEM. All of these actions demonstrate a concerted effort to ensure that the Company acted and continues to act prudently and in the best interest of customers. Understanding the root cause is extremely important to the Company, and because of this, the Company hired a third-party contractor to perform an additional RCA investigation due to the significance of the issue and to prevent future failures on

similar equipment. The Commission should reject Daymark's suggestion that the Company be subjected to a standard where it must show a cause of an outage conclusively to demonstrate prudence. Daymark's position that the Company may be at fault is unsupported and should be rejected by the Commission because of the Company's prudent actions in the operating, maintaining, and management of its Lake Side plant.

WYODAK UNIT 1 (June 6, 2019)

Q. Please describe the outage at Wyodak Unit 1.

A. On June 6, 2019, Wyodak Unit was taken offline for an economizer tube leak. After the unit was returned to service it was discovered the leak had caused the ash in the ash silo to harden requiring an outage and silo cleaning. Plant management was aware of the economizer tube leak but believed that it would not affect the ash silo because any discharge from the economizer tube would first have to travel through the scrubber first.

Q. What is your recommendation to the Commission with respect to the Wyodak Unit 1 adjustment proposed by Daymark?

A. Because the Company recognizes that it could have managed the situation more effectively, the Company agrees to remove the replacement power costs from the EBA as recommended by Daymark. The Company intends this acceptance to be non-precedential.

Q. Please summarize your recommendations regarding the disallowances proposed?

A. The Company prudently manages its thermal generation fleet for the benefit of customers. During the deferral period (which included all of the outages raised by

Daymark), the PacifiCorp-operated thermal fleet was available [redacted] of the time as compared to the NERC average for an equivalent fleet of [redacted]. This demonstrates PacifiCorp's commitment to providing the best value for our customers. The Company agrees that outages should be reviewed individually for prudence but as stated above the Company's fleet operates considerably better than the NERC average for an equivalent fleet. Daymark's proposed disallowances appear to be based on misunderstanding the circumstances of the outage or are an attempt to hold the Company to an unrealistic perfection standard.

Q. What is your recommendation to the Commission?

A. I recommend that the Commission reject the calculated disallowances for the 3 outages addressed above. My testimony demonstrates the Company was prudent in its actions.

Q. Does this conclude your response testimony?

A. Yes.

Rocky Mountain Power
Exhibit RMP___(DMR-1)
Docket No. 20-035-01
Witness: Dana M. Ralston

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Response Testimony of Dana M. Ralston

2012 Vertical Reheater

December 2020

Title: Vertical Reheater Pendants

Priority	ASSY	TUBE	LOCATION	DATE	VERIFIED	WELDER	VISUAL
A, B, C		Position	WORK REQUIRED	W/C		ID	
			Note : Asemblies numbered left to right facing in direction of the gas flow. Tubes Numbered top to bottom.				
			Note : Asemblies numbered left to right facing the rear. Tubes Numbered front to rear.				
			Tube Material: 2.25" O.D. X .203" MWT SA213T22				
			AS VIEWED FROM IK'S 51 & 52 (Roof Line)				
A	Majority		Clean out pluggage between assemblies at roof.				
A	1	6	Replace 2' tube section as marked. UT - **.108**"				
A	2	6	Replace 2' tube section as marked. UT - **.131**"				
A	3	6	Replace 2' tube section as marked. UT - **.136**"				
B	12	1	Replace 360° shield as marked.				
B	13	1	Replace 360° shield as marked.				
B	14	1	Replace 360° shield as marked.				
B	17	1	Replace 360° shield as marked.				
B	19	1	Replace 360° shield as marked.				
B	19	3	Replace 360° shield as marked.				
A	29	6	Add 2' tube shield to cover erosion area. UT - .165"				
A	33	6	Add 2' tube shield to cover erosion area. UT - .160"				
B	40	1	Replace 360° shield as marked.				
B	45	1	Replace 360° shield as marked.				
B	49	1	Replace 360° shield as marked.				
B	51	1	Replace 360° shield as marked.				
B	53	1	Replace 360° shield as marked.				
B	55	1	Replace 360° shield as marked.				
B	57	1	Replace 360° shield as marked.				
B	59	1	Replace 360° shield as marked.				

Rocky Mountain Power
Exhibit RMP___(DMR-2)
Docket No. 20-035-01
Witness: Dana M. Ralston

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Response Testimony of Dana M. Ralston

Outage Inspection Report

December 2020

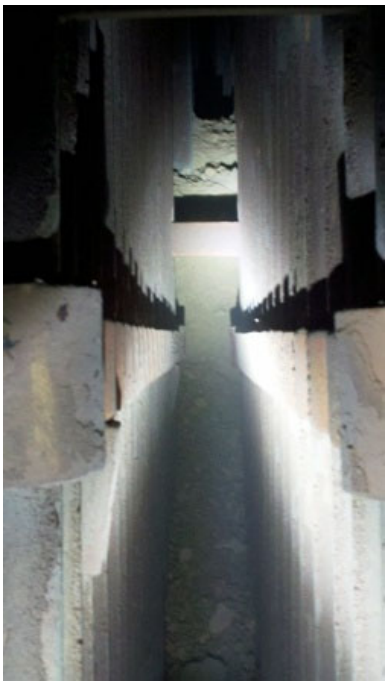
PACIFICORP
A MIDAMERICAN ENERGY HOLDINGS COMPANY

Location: Hunter Plant
Date: January 30, 2013
Engineer: Daniel Kinder
Subject: Unit 3 Boiler Inspection During

Hunter Power Plant was brought offline 1/30/2013 to fix a leak on 3-6 high pressure feedwater heater. During the outage a boiler inspection was conducted to assess the condition of the unit, and plan for future outages. Inspections on this outage were limited due to the temperatures of the boiler. The ID's fans tripped and weren't functional most of the night to cool the boiler. Also, work was being completed in the baghouse limiting the use of the fans for the safety of those working in the compartments.

Priority was given to those areas known to have higher erosion rates according to previous inspections, and tube leaks. The two areas focused on this outage were the vertical reheat pendant assemblies and the secondary superheat platen assemblies.

Vertical RH Assemblies:
No tubes were found with thicknesses below 80% of min wall thickness. The ash build up in the area made it difficult to inspect, but it was not more than typically build up in the area. Thickness measurements will be added to Unit 3 spreadsheet to track erosion rates.



Rocky Mountain Power
Exhibit RMP___(DMR-3)
Docket No. 20-035-01
Witness: Dana M. Ralston

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Response Testimony of Dana M. Ralston

2016 Vertical Reheater

December 2020

Vertical Reheater Pendants

Priority A, B, C	ASSY	TUBE Position	LOCATION WORK REQUIRED	DATE W/C	VERIFIED	WELDER ID	VISUAL			
A	8	C1	Replace 5' eroded tube section as marked.							
A	27	C1	Replace 5' eroded tube section as marked.							
A	29	C1	Replace 5' eroded tube section as marked.							
A	35	C1	Replace 5' eroded tube section as marked.							
A	37	C1	Replace 5' eroded tube section as marked.							
A	39	C1	Replace 5' eroded tube section as marked.							
A	40	C1	Replace 5' eroded tube section as marked.							
A	45	C1	Replace 5' eroded tube section as marked.							
A	47	C1	Replace 5' eroded tube section as marked.							
A	48	C1	Replace 5' eroded tube section as marked.							
A	49	C1	Replace 5' eroded tube section as marked.							
A	50	C1	Replace 5' eroded tube section as marked.							
A	51	C1	Replace 5' eroded tube section as marked.							
A	53	C1	Replace 5' eroded tube section as marked.							
A	54	C1	Replace 5' eroded tube section as marked.							
A	55	C1	Replace 5' eroded tube section as marked.							
A	56	C1	Replace 5' eroded tube section as marked.							
A	57	C1	Replace 5' eroded tube section as marked.							
A	59	C1	Replace 5' eroded tube section as marked.							
A	61	C1	Replace 5' eroded tube section as marked.							
A	64	C1	Replace 5' eroded tube section as marked.							
A	65	C1	Replace 5' eroded tube section as marked.							
A	66	C1	Replace 5' eroded tube section as marked.							
A	67	C1	Replace 5' eroded tube section as marked.							
A	68	C1	Replace 5' eroded tube section as marked.							
			AS VIEWED FROM IK'S 67 & 68							
B			Repair refractory around the man way openings on both the left and right side walls.							
	AS VIEWED FROM TOP SCAFFOLD DECK AT THE ROOF (REAR SIDE OF FRONT PANELS)									
			No repair items noted.							
			AS VIEWED FROM IK'S 61 & 62 (REAR PANELS)							
B	10	5-6,10-11	Reposition disengaged alignment bracket as marked.							

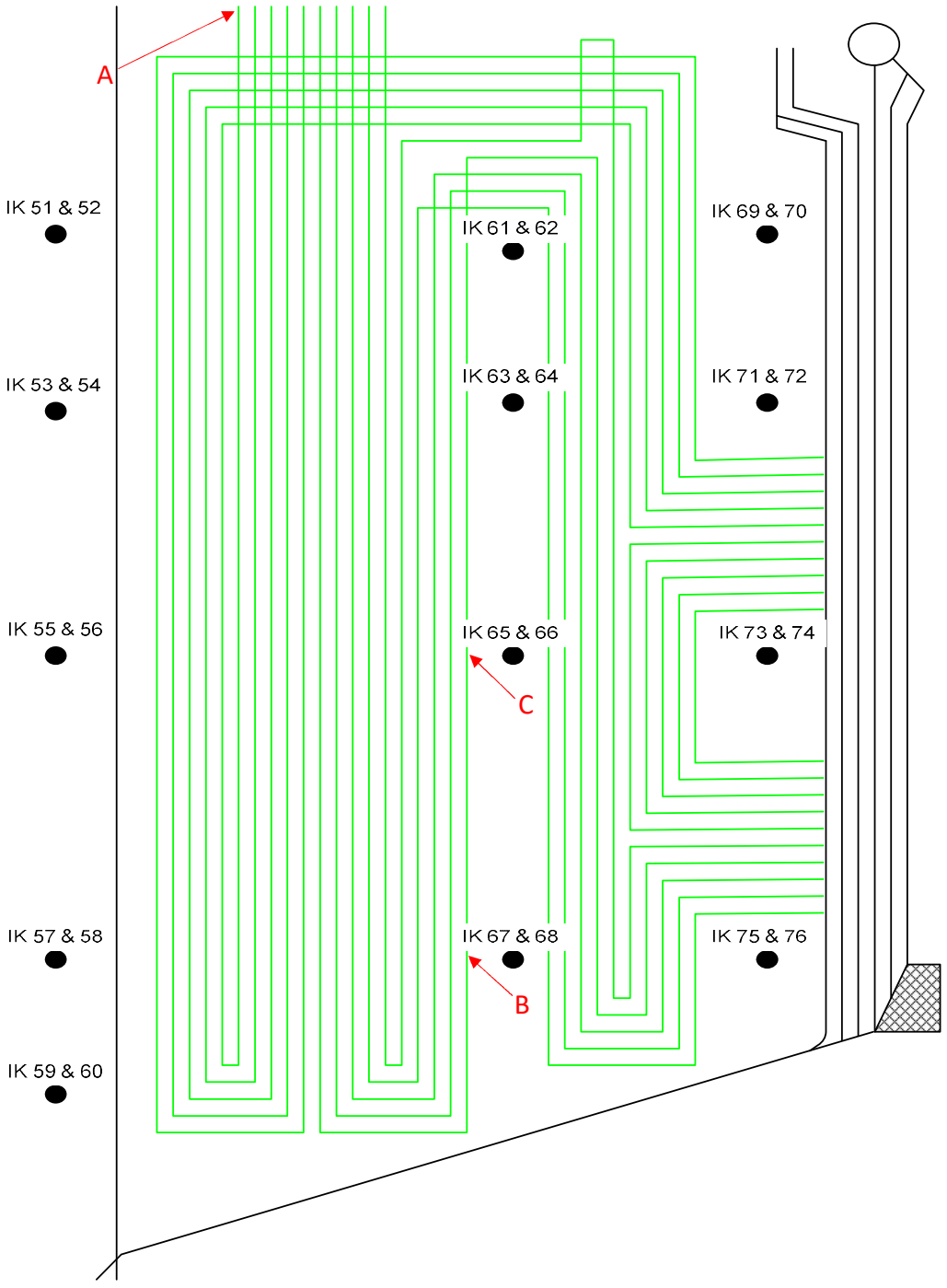
Note: Items with asterisk denote revisions

Vertical Reheater Pendants

Priority A, B, C	ASSY	TUBE Position	LOCATION WORK REQUIRED	DATE W/C	VERIFIED	WELDER ID	VISUAL			
B	14	5-6	Reposition disengaged alignment bracket as marked.							
B	22	9-10	Reposition disengaged alignment bracket as marked.							
B	42	9-10	Reposition disengaged alignment bracket as marked.							
B	48	9-10	Reposition disengaged alignment bracket as marked.							
B	56	9-10	Reposition disengaged alignment bracket as marked.							
B	58	9-10	Reposition disengaged alignment bracket as marked.							
B	60	8-9	Reposition disengaged alignment bracket as marked.							
B	62	4-5	Reposition disengaged alignment bracket as marked.							
B	64	9-10	Reposition disengaged alignment bracket as marked.							
B	68	5-9	Reposition disengaged alignment bracket as marked.							
			TOTALS:							
			30 TUBE REPLACEMENTS							
			72 SHIELD ADDITIONS							
			21 REPAIR ALIGNMENT BRACKETS							

Note: Items with asterisk denote revisions

VERTICAL REHEATER UT DATA



VERTICAL REHEATER UT DATA

Color Code
0.203" and Above - Blue
0.173" thru 0.202" - Green
0.143" thru 0.172" - Pink
0.142" and Below - Red

Position A through C - SA 213 T22 2.25" OD x 0.203" MWT

Assy. #	A	B	C
1	0.213	0.221	0.224
2	0.235	0.230	**0.085**
3	0.212	0.225	**0.102**
4	0.228	0.224	**0.098**
5	0.226	0.225	0.164
6	0.217	0.238	0.225
7	0.235	0.234	0.160
8	0.238	0.226	**0.135**
9	0.233	0.235	0.162
10	0.235	0.228	0.222
11	0.234	0.232	0.162
12	0.233	0.238	0.228
13	0.232	0.234	0.220
14	0.237	0.220	0.204
15	0.221	0.233	0.209
16	0.236	0.237	0.229
17	0.238	0.227	0.219
18	0.224	0.230	0.220
19	0.231	0.236	0.171
20	0.232	0.232	0.230
21	0.197	0.235	0.228
22	0.227	0.223	0.229
23	0.236	0.225	0.228
24	0.172	0.231	0.222
25	**0.107**	0.235	0.216
26	0.245	0.222	0.224
27	0.246	0.239	0.150
28	0.158	0.227	0.214
29	0.226	0.228	**0.140**
30	0.256	0.227	0.170
31	0.226	0.232	0.182
32	0.195	0.230	0.224
33	0.239	0.236	0.217
34	0.165	0.237	0.219
35	0.183	0.240	**0.132**
36	0.181	0.233	0.181

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37	0.193	0.227	**0.091**
38	0.231	0.236	0.156
39	0.236	0.219	**0.099**
40	0.232	0.228	**0.109**
41	0.234	0.230	0.159
42	0.243	0.230	0.227
43	0.250	0.237	0.199
44	0.234	0.239	0.162
45	0.237	0.232	**0.102**
46	x	0.230	0.162
47	x	0.227	**0.079**
48	x	0.233	**0.139**
49	0.235	0.229	**0.106**
50	0.239	0.224	**0.125**
51	0.236	0.229	**0.096**
52	0.171	0.239	0.186
53	0.219	0.250	**0.106**
54	0.234	0.247	0.148
55	x	0.232	0.148
56	x	0.236	**0.073**
57	x	0.246	**0.076**
58	x	0.226	0.232
59	x	0.248	**0.098**
60	0.240	0.241	0.222
61	0.242	0.231	**0.113**
62	x	0.245	0.222
63	x	0.251	0.224
64	0.235	0.238	**0.047**
65	0.207	0.253	**0.082**
66	0.195	0.249	**0.072**
67	0.205	0.231	**0.093**
68	0.235	0.238	**0.076**
69	0.211	0.223	0.230