



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 5, 2010

MEMORANDUM TO: Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Mohan C. Thadani, Senior Project Manager *Mohan Thadani*
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: FORTHCOMING MEETING WITH REPRESENTATIVES OF
UNION ELECTRIC COMPANY (TAC NO. ME2822)

DATE & TIME: Thursday, November 18, 2010
9:30 a.m. to 11:00 a.m. EST

LOCATION: U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, Room O-8B02
Rockville, Maryland

PURPOSE: To discuss Union Electric Company's (the licensee's) planned response to the U.S. Nuclear Regulatory Commission (NRC) staff's requests for additional information dated October 20 and 25, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML102930673 and ML102980368, respectively), regarding Callaway Plant, Unit 1's license amendment request to revise Technical Specification (TS) 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation Functions," dated November 25, 2009 (ADAMS Accession No. ML093290318).

CATEGORY 1:* This is a Category 1 public meeting. The public is invited to observe this meeting and will have one or more opportunities to communicate with the NRC after the business portion, but before the meeting is adjourned.

PARTICIPANTS: Participants from the NRC include members of the Office of Nuclear Reactor Regulation (NRR).

NRC		Union Electric Company
M. Thadani	K. Bucholtz	S. Maglio
J. Polickoski	A. Howe	T. Ellwood
M. Markley	G. Casto	B. Yates
S. Gardocki	et al.	

* Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings" (67 FR 36920), May 28, 2002.

Interested members of the public can participate in this meeting via a toll-free audio teleconference. Please call one of the meeting contacts listed below November 17, 2010, 3:00 p.m. (Eastern Standard Time) to get the telephone number and the pass code.

MEETING CONTACTS:	Mohan Thadani, NRR 301-415-1476 mohan.thadani@nrc.gov	James T. Polickoski, NRR 301-415-5430 james.polickoski@nrc.gov
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Docket No 50-483

Enclosure:
Agenda

cc w/encl: Distribution via Listserv

AGENDA

FORTHCOMING MEETING WITH UNION ELECTRIC COMPANY

U.S. NUCLEAR REGULATORY COMMISSION

Thursday, November 18, 2010

9:30 a.m. – 11:00 a.m. EST

1. Introductions
2. Preliminary responses to requests for additional information (RAIs) responses (Union Electric Company)
 - a) Responses to specific RAI's dated October 20 and 25, 2010
 - b) Discussions of proposed modifications to TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation Functions" (see Attachment)
3. Questions (NRC staff)
4. Public participation
5. Closing remarks

Enclosure

ATTACHMENT

Proposed modifications to TS 3.3.2, "Engineered Safety Feature
Actuation System (ESFAS) Instrumentation Functions"

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. One channel inoperable.	<p>----- NOTE ----- The inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels. -----</p> <p>I.1 Place channel in trip.</p> <p><u>OR</u></p> <p>I.2 Be in MODE 3.</p>	<p>72 hours</p> <p>78 hours</p>
J. One or more Main Feedwater Pumps trip channel(s) inoperable.	----- NOTE ----- One inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels. ----- <p>J.1 Place channel(s) in trip.</p> <u>OR</u> <p>J.2 Be in MODE 3.</p>	1 hour <p>7 hours</p>

(continued)

INSERT A1

INSERT A1

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<p>J. Two trains inoperable.</p>	<p>-----NOTE----- One inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels. -----</p>		
	<p>J.1.1 Restore one train to OPERABLE status.</p>		<p>1 hour</p>
	<p><u>OR</u></p>		
	<p>J.1.2 Place inoperable channels in trip.</p>		<p>1 hour</p>
<p><u>OR</u></p>			
<p>J.2 Be in MODE 3.</p>	<p>7 hours</p>		

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
M. Not used. <i>INSERT B1</i>		
N. One or more Containment Pressure - Environmental Allowance Modifier channel(s) inoperable.	N.1 Place channel(s) in trip. <u>OR</u> N.2.1 Be in MODE 3. <u>AND</u> N.2.2 Be in MODE 4.	72 hours 78 hours 84 hours
O. One channel inoperable.	O.1 Place channel in trip. <u>AND</u> O.2 Restore channel to OPERABLE status.	1 hour <i>24 hours</i> During performance of the next required COT

(continued)

INSERT B1

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<p>M. One train inoperable.</p>	<p>-----NOTE----- One inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels. -----</p>		
	<p>M.1.1 Restore channel(s) to OPERABLE status.</p>		<p>24 hours</p>
	<p><u>OR</u></p>		
	<p>M.1.2 Place inoperable channel(s) in trip.</p>		<p>24 hours</p>
<p><u>OR</u></p>			
<p>M.2 Be in MODE 3.</p>	<p>30 hours</p>		

Table 3.3.2-1 (page 9 of 11)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE ^(a)	
6. Auxiliary Feedwater						
d. SG Water Level Low-Low						
	(3) Not used.					
	(4) Containment Pressure - Environmental Allowance Modifier	1, 2, 3	4	N	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≤ 2.0 psig
e. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
f. Loss of Offsite Power	1,2,3	2 trains	R	SR 3.3.2.7 SR 3.3.2.10	NA	
g. Trip of all Main Feedwater Pumps	1,2 ⁽ⁿ⁾	2 per pump 2 trains 2 channels per train [^]	J, M	SR 3.3.2.8	NA	
h. Auxiliary Feedwater Pump Suction Transfer on Suction Pressure - Low	1,2,3			SR 3.3.2.1 SR 3.3.2.9 SR 3.3.2.10 SR 3.3.2.12	≥ 20.64 psia	

- (a) The Allowable Value defines the limiting safety system setting except for Functions 1.e, 4.e.(1), 5.c, 5.e.(1), 5.e.(2), 6.d.(1), and 6.d.(2) (the Nominal Trip Setpoint defines the limiting safety system setting for these Functions). See the Bases for the Nominal Trip Setpoints.
- (n) Trip function may be blocked just before shutdown of the last operating main feedwater pump and restored just after the first main feedwater pump is put into service following performance of its startup trip test.

BASES

APPLICABLE
SAFETY
ANALYSES,
LCO, AND
APPLICABILITY

6. Auxiliary Feedwater (continued)

g. Auxiliary Feedwater - Trip of All Main Feedwater Pumps

*INSERT
3.3.2.6.g*

A Trip of all MFW pumps (PAE01A and PAE01B) is an indication of a loss of MFW and the subsequent need for some method of decay heat and sensible heat removal to bring the reactor back to no load temperature and pressure.

~~Each turbine-driven MFW pump is equipped with two pressure switches (one in separation group 1 and one in separation group 4) on the oil line for the speed control system. A low pressure signal from either of these pressure switches indicates a trip of that pump. Two OPERABLE channels per pump satisfy redundancy requirements with one out of two logic in the same separation group on both pumps required for signal actuation.~~ A trip of all MFW pumps (PAE01A and PAE01B) starts the motor driven AFW pumps to ensure that the intact SGs are available with water to act as the heat sink for the reactor.

Function 6.g must be OPERABLE in MODES 1 and 2. This ensures that the intact SGs are provided with water to serve as the heat sink to remove reactor decay heat and sensible heat in the event of an accident. In MODES 3, 4, and 5, the turbine-driven MFW pumps may be normally shut down, and thus pump trip is not indicative of a condition requiring automatic AFW initiation. Note (n) of Table 3.3.2-1 allows the blocking of this ESFAS function in MODE 2 just before shutdown of the last operating turbine-driven main feedwater pump and the restoration of this trip function just after the first turbine-driven main feedwater pump is put into service following its startup trip test. This limits the potential for inadvertent AFW actuations during normal startups and shutdowns.

A turbine-driven MFW pump is in service when the pump's stop valves are open, the governor control valves are either in manual or automatic control, and feedwater is being supplied to the steam generators.

One cause of multiple channel inoperability which requires entry into Condition J occurs routinely during normal plant operation. A single turbine-driven MFW pump may be in service in MODE 1 at reduced power levels if the other

renders both actuation trains inoperable and

(continued)

INSERT 3.3.2.6.g

There are two actuation trains for this function with two channels per actuation train. The separation group 1 channels (driven from FCPSL0025 and FCPSL0125) make up one actuation train and the separation group 4 channels (driven from FCPSL0026 and FCPSL0126) make up the second actuation train. Signal actuation requires that both channels in a given train be OPERABLE. If one or both channels in an actuation train are inoperable, then that train is inoperable.

BASES

APPLICABLE
SAFETY
ANALYSES,
LCO, AND
APPLICABILITY

g. Auxiliary Feedwater - Trip of All Main Feedwater Pumps
(Continued)

turbine-driven MFW pump has not yet been placed into service during power ascension or has been removed from service for maintenance. Prior to placing a turbine-driven MFW pump into service, the status of its turbine control circuitry is changed from "tripped" to "reset" via its Trip/Reset handswitch (FCHIS0018 or FCHIS0118) such that the two oil pressure switch channels on that turbine-driven MFW pump experience the high oil pressures indicative of an operating pump prior to that turbine-driven MFW pump providing feedwater flow to the steam generators. In this status, the turbine-driven MFW pump that is not yet in service would not satisfy the AFW start function actuation logic if the operating turbine-driven MFW pump were to trip at this time since it takes one tripped channel on each turbine-driven MFW pump in the same separation group to initiate an auxiliary feedwater actuation signal. Therefore, with one turbine-driven MFW pump turbine in reset, Condition J must be entered for two inoperable oil pressure channels on that turbine-driven MFW pump. This Condition imposes a partial AFW actuation status (or partial trip) on the plant.

restoration or

*requires
two actuation trains inoperable*

This ESFAS function is an anticipatory start signal for which no credit is taken in any accident or transient analysis. The safety analyses credit actuation of the ~~motor~~-driven AFW pumps upon a low-low steam generator water level signal in any steam generator and after a safety injection signal.

motor -

h. Auxiliary Feedwater - Pump Suction Transfer on Suction Pressure - Low

A low pressure signal in the AFW pump suction line protects the AFW pumps against a loss of the normal supply of water for the pumps, the CST. Three pressure switches are located on the AFW pump suction line from the CST. A low pressure signal sensed by any two of the

(continued)

BASES

ACTIONS

I.1 and I.2 (continued)

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 12 hours for surveillance testing of other channels. The 72 hours allowed to place the inoperable channel in the tripped condition, and the 12 hours allowed for an inoperable channel to be in the bypassed condition for testing, are justified in Reference 18.

~~I.1 and I.2~~ J.1.1, J.1.2, and J.2

*INSERT 3.3.2.J1
(start new paragraph)*

Condition J applies to the AFW pump start on trip of all MFW pumps (PAE01A and PAE01B).

This action addresses the train orientation of the BOP ESFAS for the auto start function of the AFW System on loss of all MFW pumps (PAE01A and PAE01B). The OPERABILITY of the AFW System must be assured by providing automatic start of the AFW System pumps. ~~If one or more channel(s) are inoperable, 1 hour is allowed to place the inoperable channel(s) in the tripped condition. If the channels cannot be tripped in 1 hour, 6 additional hours are allowed to place the unit in MODE 3. The~~ allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, the unit does not have any analyzed transients or conditions that require the explicit use of the protection function noted above. The Required Actions are modified by a Note that allows one inoperable channel to be bypassed for up to 2 hours for surveillance testing of other channels.

K.1, K.2.1, and K.2.2

Condition K applies to:

- RWST Level - Low Low Coincident with Safety Injection.

RWST Level - Low Low Coincident With SI provides actuation of switchover to the containment recirculation sumps. Note that this Function requires the bistables to energize to perform their required action. The failure of up to two channels will not prevent the operation of this Function. This Action Statement limits the duration that an RWST level channel could be inoperable in the tripped condition in order to limit the probability for automatic switchover to an empty containment sump upon receipt of an inadvertent safety injection signal (SIS), coincident with a single failure of another RWST level channel, or for premature

(continued)

INSERT 3.3.2.J1

Condition J applies if both actuation trains are inoperable. In this Condition the actuation function has been lost, i.e., more than one channel is inoperable and the inoperable channels are not within the same separation group whether on separate MFW pumps or on the same MFW pump. If Condition J is entered, 1 hour is allowed to restore one actuation train to OPERABLE status or to place the inoperable channels in the tripped condition.

If one channel per MFW pump is inoperable within different separation groups or if both channels on the same MFW pump are inoperable, the actuation function is not available since neither actuation train is OPERABLE. As shown on FSAR Figure 7.3-1, sheet 2 (Ref. 2), satisfying the trip logic requires the presence of a low oil pressure signal in the same separation group on each MFW pump. For example, an inoperable separation group 1 channel on one pump coincident with an inoperable separation group 4 channel on the other pump would lead to the inoperability of both actuation trains and the loss of the actuation function. Similarly, the loss of both channels on the same MFW pump would also lead to the loss of the actuation function. Therefore, Condition J covers any of the following situations:

- Channels FCP-0025 and FCP-0026 inoperable;
- Channels FCP-0125 and FCP-0126 inoperable;
- Channels FCP-0025 and FCP-0126 inoperable;
- Channels FCP-0026 and FCP-0125 inoperable.

The wording of Condition J limits the duration of the loss of actuation function consistent with Reference 23.

If Required Action J.1.1 or J.1.2 can not be met within the 1 hour Completion Time, 6 additional hours are allowed to place the unit in MODE 3.

BASES

ACTIONS
(continued)

~~M.1 and M.2~~ M.1.1, M.1.2, and M.2

~~Not used.~~

→ INSERT 3.3.2.M1

N.1, N.2.1, and N.2.2

Condition N applies to the Environmental Allowance Modifier (EAM) circuitry for the SG Water Level - Low Low trip Functions in MODES 1, 2, and 3. With one or more EAM channel(s) inoperable, they must be placed in the tripped condition within 72 hours. Placing an EAM channel in trip automatically enables the SG Water Level - Low Low (Adverse Containment Environment) bistable for that protection channel, with its higher SG level Trip Setpoint (a higher trip setpoint means a feedwater isolation or an AFW actuation would occur sooner). The Completion Time of 72 hours is based on Reference 18. If the inoperable channel cannot be placed in the tripped condition within the specified Completion Time, the unit must be placed in a MODE where this Function is not required to be OPERABLE. The unit must be placed in MODE 3 within an additional six hours and in MODE 4 within the following six hours.

O.1 and O.2

Condition O applies to the Auxiliary Feedwater Pump Suction Transfer on Suction Pressure - Low trip Function. The Condensate Storage Tank is the highly reliable and preferred suction source for the AFW pumps. This function has a two-out-of-three trip logic. Therefore, continued operation is allowed with one inoperable channel until the performance of the next monthly COT on one of the other channels, as long as the inoperable channel is placed in trip within ~~4 hours~~ 24 hours.

P.1 and P.2

Condition P applies to the Auxiliary Feedwater Manual Initiation trip Function and the Steam Generator Blowdown and Sample Line Isolation Valve Actuation Function 10.a. The associated auxiliary feedwater pump(s) and the associated steam generator blowdown and sample line isolation valve(s) must be declared inoperable immediately when one or more channel(s) or train(s) is inoperable. Refer to LCO 3.7.5, "Auxiliary Feedwater (AFW) System," and to LCO 3.7.19, "Secondary Side Isolation Valves."

(continued)

INSERT 3.3.2.M1 (page 1 of 2)

Condition M applies to the AFW pump start on trip of all MFW pumps (PAE01A and PAE01B).

This action addresses the train orientation of the BOP ESFAS for the auto start function of the AFW System on loss of all MFW pumps (PAE01A and PAE01B). The OPERABILITY of the AFW System must be assured by providing automatic start of the AFW System pumps.

Condition M applies if one actuation train is inoperable. In this Condition the actuation function has not been lost, i.e., only one channel out of the four total channels is inoperable or two channels out of the four total channels are inoperable but are in the same separation group. If Condition M is entered, 24 hours are allowed to restore inoperable channel(s) to OPERABLE status or place the inoperable channel(s) in the tripped condition. If the cause of the train inoperability is a single channel inoperable, that channel may either be restored to OPERABLE status within 24 hours or placed in the tripped condition within 24 hours. If the cause of the train inoperability is the inoperability of both channels in that actuation train, the following must occur:

- Both inoperable channels must be restored to OPERABLE status within 24 hours, or
- One inoperable channel must be restored to OPERABLE status within 24 hours and the other inoperable channel tripped within 24 hours, or
- Both inoperable channels must be placed in the tripped condition within 24 hours. However, this will result in the generation of an auxiliary feedwater (AFW) actuation signal to the motor-driven AFW pumps.

If a single channel out of the total of four channels is inoperable, or if one channel per MFW pump is inoperable but the Condition is limited to the same separation group, one actuation train is inoperable; however, the actuation function remains available via the OPERABLE actuation train. As shown on FSAR Figure 7.3-1, sheet 2 (Ref. 2), satisfying the trip logic requires the presence of a low oil pressure signal in the same separation group on each MFW pump. For example, an inoperable separation group 1 channel on one pump coincident with an inoperable separation group 1 channel on the other pump would leave the separation group 4 channels available to perform the actuation function. Therefore, Condition M covers any of the following situations:

INSERT 3.3.2.M1 (page 2 of 2)

- A single channel out of four inoperable;
- Channels FCP-0025 and FCP-0125 inoperable;
- Channels FCP-0026 and FCP-0126 inoperable;

The wording of Condition M limits the Completion Time duration consistent with Reference 23.

If the channel(s) can not be restored or tripped in 24 hours, 6 additional hours are allowed to place the unit in MODE 3. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, the unit does not have any analyzed transients or conditions that require the explicit use of the protection function noted above. The Required Actions are modified by a Note that allows one inoperable channel to be bypassed for up to 2 hours for surveillance testing of other channels.

BASES

*no change (SR 3.3.2.8
applies to Function 6.g)*

SURVEILLANCE
REQUIREMENTS

SR 3.3.2.6 (continued)

verified by a continuity check of the circuit containing the slave relay. This test is performed every 92 days. The SR is modified by a Note that excludes slave relays K602, K620, K622, K624, K630, K740, K741, and K750 which are included in testing required by SR 3.3.2.13 and SR 3.3.2.14. The Frequency is adequate, based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.7

SR 3.3.2.7 is the performance of a TADOT every 18 months. This test is a check of the AFW pump start on Loss of Offsite Power trip Function and the Steam Generator Blowdown and Sample Line Isolation Valve Actuation Function 10.d. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The trip actuating devices tested within the scope of SR 3.3.2.7 are the LSELS output relays and BOP ESFAS separation groups 1 and 4 logic associated with the automatic start of the turbine driven auxiliary feedwater pump and closure of the steam generator blowdown isolation valves and sample line isolation valves on an ESF bus undervoltage condition. The Frequency is adequate. It is based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints for relays. The trip actuating devices tested have no associated setpoint.

SR 3.3.2.8

SR 3.3.2.8 is the performance of a TADOT. This test is a check of the Manual Actuation Functions, AFW pump start on trip of all MFW pumps (PAE01A and PAE01B), and manual generation of an SGBSIS (Function 10.a). The Manual Safety Injection TADOT shall independently verify OPERABILITY of the undervoltage and shunt trip handswitch contacts for both the Reactor Trip Breakers and Reactor Trip Bypass Breakers as well as the contacts for safety injection actuation. It is performed every 18 months. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay

(continued)

BASES

no changes

SURVEILLANCE
REQUIREMENTS

SR 3.3.2.8 (continued)

are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The Frequency is adequate, based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT for manual initiation Functions. The manual initiation Functions have no associated setpoints. The Note exclusion does not explicitly apply to the AFW pump start on trip of both turbine-driven MFW pumps; however, the TADOT test procedures for that Function do not require the verification of a nominal trip setpoint or allowable value since none have ever been specified in the Technical Specifications for that anticipatory actuation signal which is not credited in any accident or transient analysis.

SR 3.3.2.9

SR 3.3.2.9 is the performance of a CHANNEL CALIBRATION.

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy. CHANNEL CALIBRATIONS must be performed consistent with the assumptions of Reference 6.

The Frequency of 18 months is based on the assumed calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

This SR is modified by a Note stating that this test should include verification that the time constants are adjusted to the prescribed values where applicable. This does not include verification of time delay relays. These are verified via response time testing per SR 3.3.2.10.

The portion of the automatic PORV actuation circuitry required for COMS is calibrated in accordance with SR 3.4.12.9.

SR 3.3.2.10

This SR verifies the individual channel ESF RESPONSE TIMES are less than or equal to the maximum values assumed in the accident analysis.

(continued)

Interested members of the public can participate in this meeting via a toll-free audio teleconference. Please call one of the meeting contacts listed below November 17, 2010, 3:00 p.m. (Eastern Standard Time) to get the telephone number and the pass code.

MEETING CONTACTS:	Mohan Thadani, NRR	James T. Polickoski, NRR
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Docket No 50-483

Enclosure:
Agenda

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