

## Lent, Susan

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**From:** Yates, Bert G [GYates@ameren.com]  
**Sent:** Thursday, December 16, 2010 11:00 AM  
**To:** Polickoski, James  
**Cc:** Maglio, Scott A; Elwood, Thomas B; Eickelman, Richard E  
**Attachments:** LDCN 09-0039 12-15-10 complete TS markups.pdf

**Importance:** High

Scott Maglio asked that I send the attached file to you. It has been through several review iterations here and reflects our latest perspectives.

Condition M has been revised to reflect a baseline Condition that can be re-entered each time a channel becomes inoperable. It has a 24-hour CT and a bypass testing Note.

Multiple inoperable channel Conditions would also be entered simultaneously, whether under Condition J or Condition T.

Condition J now covers the lowest common denominator for a loss of actuation function (a loss of function is "blind" as to whether it's due to 2 inoperable channels on one pump or on different pumps) and is limited to a 1-hour CT. It has no bypass testing Note.

Condition T covers more than 2 inoperable channels and requires that one actuation train (two channels in the same separation group) be restored in 1 hour.

Condition U is a universal default to MODE 3 when the Required Action and Associated Completion Time of Conditions J, M, or T are not met.

Table 3.3.2-1 has been revised to specify 4 Required Channels.

A new footnote (u) has also been added to MODE 1 with a 1 hour limitation for placing an MFP into service. This reflects not only the feedback from the BOP Branch and OTSB during our 11/18/10 meeting, but also mirrors Watts Bar LA75 dated 3/4/09 (ADAMS ML090480566) and Sequoyah LA 319/312 dated 8/29/08 (ADAMS ML082401330, ML082401385, and ML082401446), except that those amendments both include a 4-hour loss of function delay time prior to entering a TS Condition for starting the 2<sup>nd</sup> MFP whereas we're limiting that footnote to 1 hour per the previously expressed Staff positions.

This combination of Conditions (absent any undue Note clutter to the extent possible) and new footnote (u) provides what we feel is the best approach to satisfy the risk basis for the amendment as well as our desire to human factor this complex situation for the operators (if that's possible for a function with 3 Conditions). We would like to receive Staff feedback at your earliest convenience since Bases markups still need to be generated, the 10/20/10 RAI responses need to be revised, and our review committees need to be engaged on the final supplement.

### **Bert Yates**

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