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Docket No.: 50-425

NL-16-2631

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant – Unit 2
Exigent Request to Revise Technical Specifications LCO 3.7.9 for a One-Time Change to
Support a Unit 2 Nuclear Service Cooling Water Transfer Pump Repair

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company hereby requests an exigent amendment to Vogtle Electric Generating Plant (VEGP) Unit 2 Operating License NPF-81. The proposed change would revise Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.7.9, "Ultimate Heat Sink (UHS)", such that a 77 day Completion Time is allowed for Required Action D.2.2 for an inoperable NSCW basin transfer pump. The TS changes would be a one-time change and in effect only until January 23, 2017.

The proposed exigent amendment is requested because the 2A NSCW transfer pump is inoperable and will likely not be declared OPERABLE until after the expiration of the current Required Action and associated Completion Time of TS 3.7.9 Condition D, upon which time Condition E would be entered. TS 3.7.9 Condition E requires the plant to be in MODE 3 in 6 hours and in MODE 4 in 12 hours. The repair of the 2A NSCW transfer pump is in progress.

SNC requests approval of the proposed license amendment on an exigent basis by December 23, 2016, to avoid entry into TS 3.7.9 Condition E. The proposed change would be effective immediately upon issuance of the amendment.

Enclosure 1 contains a description of the proposed change, the supporting engineering analysis and the no significant hazards determination. Enclosure 2 contains the marked-up TS page, and Enclosure 3 provides the clean-typed TS page.

This letter contains no NRC commitments.

If you have any questions, please contact Ken McElroy at (205) 992-7369.

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Mr. C. R. Pierce states he is Regulatory Affairs Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/kgf/



Sworn to and subscribed before me this 13th day of December, 2016.

Catherine B. Gelfand
Notary Public

My commission expires: 1/2/2018

Enclosures: 1. Description and Assessment of Proposed Change
2. Marked-Up Technical Specifications Page
3. Clean-Typed Technical Specifications Page

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Vogtle Electric Generating Plant – Unit 2
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Enclosure 1

Description and Assessment of Proposed Change

Enclosure 1
Description and Assessment of Change

1.0 Summary Description

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company hereby requests an exigent amendment to Vogtle Electric Generating Plant (VEGP) Unit 2 Operating License NPF-81. The proposed change would revise Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.7.9, "Ultimate Heat Sink (UHS)", such that a 77 day Completion Time is allowed for Required Action D.2.2 for an inoperable NSCW basin transfer pump. The TS changes would be a one-time change and in effect only until January 23, 2017.

The proposed exigent amendment is requested because the 2A NSCW transfer pump is inoperable and will likely not be declared OPERABLE until after the expiration of the current Required Action and associated Completion Time of TS 3.7.9 Condition D, upon which time Condition E would be entered. TS 3.7.9 Condition E requires the plant to be in MODE 3 in 6 hours and in MODE 4 in 12 hours. The repair of the 2A NSCW transfer pump is in progress.

2.0 Detailed Description

2.1 System Description

The NSCW transfer pump is a column type design which is over 80 feet in length. There are 8 pairs of seismic restraint pins spaced along the length of the pump. These pins fit into matching loops embedded into the wall of the NSCW tower basin. The alignment of these pins is so precise that the pump column mating flanges are line scribed (match marked) prior to disassembly so that when the columns are reassembled the pins and loops realign. Even with this precaution, divers are sometimes required to enter the water, loosen the column bolts, shimmy the pin into the loop and then retighten the column bolts. The 8 pairs of seismic pins are roughly but not exactly 180 degrees apart on their respective flanges. When the pumps were installed 30 years ago, the mating loops to the seismic pins were welded to the basin walls with the existing pump in place. Because of this custom fit, each pump is unique to its own basin and as a result removal and replacement is challenging.

The NSCW system provides cooling water for the containment coolers, control building essential chiller condensers, various engineered safety features (ESF) pump coolers, standby diesel generator jacket water coolers, and the component cooling water (CCW) and auxiliary component cooling water (ACCW) heat exchangers. The NSCW system transfers the heat removed from these systems to the Ultimate Heat Sink (UHS). The UHS consists of the NSCW mechanical draft cooling towers. Two 100-percent capacity redundant NSCW towers are provided for each generating unit, with one tower associated with each train of the NSCW system. Each NSCW tower consists of a basin containing the UHS water and an upper structure in which the NSCW heat loads are transferred to the atmosphere. The combined storage capacity of the two tower basins per unit provide sufficient cooling for at least 30 days, with no makeup water, assuming two-train operation for 1 day and single-train operation for the remaining 29 days. The design is based upon maximum conditions of dry and wet bulb temperatures as they affect peak basin temperature, tower evaporation losses and basin capacity.

The UHS provides a heat sink for process and operating heat from safety related components during a transient or accident, as well as during normal operation. This is done by utilizing the

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NSCW system and the Component Cooling Water (CCW) system. Each redundant NSCW tower consists of a basin that contains the UHS water supply and an upper structure that contains four individual fan spray cells where the heat loads are transferred to the atmosphere. Each spray cell contains one safety-related temperature controlled fan. Instrumentation is provided for monitoring basin level and water temperature. The tower basins each contain a safety-related transfer pump to permit the use of the combined storage capacity of the basins. The combined storage capacity of two tower basins provides greater than a 30 day cooling water supply assuming the worst combination of meteorological conditions and accident heat loads which maximize the tower heat load, basin temperature, and evaporative losses.

2.2 Current Technical Specification Requirements

TS 3.7.9 requires the UHS to be OPERABLE in Modes 1, 2, 3, and 4. SR 3.7.9 requires verification of the NSCW basin transfer pumps in accordance with the Inservice Testing Program.

The LCO 3.7.9 Bases state that the UHS is required to be OPERABLE and is considered OPERABLE if it contains a sufficient volume of water at or below the maximum temperature that would allow the NSCW to operate for at least 30 days following the design basis LOCA without the loss of net positive suction head (NPSH) and without exceeding the maximum design temperature of the equipment served by the NSCW. In order to meet these requirements, two NSCW tower basins are required OPERABLE with the following:

1. Basin water level must be ≥ 80.25 feet as measured from the bottom of the basin,
2. Basin water temperature must be $\leq 90^{\circ}\text{F}$,
3. Two OPERABLE trains of NSCW tower fans/spray cells, each train with the required number of fans/spray cells, and
4. Two OPERABLE NSCW basin transfer pumps.

2.3 Need for Exigent Change

On August 12, 2016, SNC requested a license amendment to extend the Completion Time of Required Action D.2.2 to permit refurbishment of the 2B NSCW basin transfer pump. The amendment was requested because the pump needed refurbishment during normal operation due to declining performance. On October 31, 2016, the NRC issued the requested license amendment. On November 7, 2016, the 2B NSCW basin transfer pump was removed from service to begin the maintenance work.

On December 9, 2016, the 2B NSCW basin transfer pump was undergoing functional testing to return to OPERABILITY. Running the 2A NSCW basin transfer pump was performed during the time the 2B transfer pump was undergoing functional testing to minimize impact to the two NSCW cooling tower basin levels. On December 9, 2016 at 1734 EST, the 2A NSCW Transfer pump received a low alarm on discharge pressure and tripped on high motor amperage and it was declared INOPERABLE, which placed Unit 2 in TS 3.7.9, Condition E. On December 9, 2016, at 1937 EST, the 2B NSCW transfer pump was declared OPERABLE, upon which time TS 3.7.9, Condition E was exited. However, since TS 3.7.9, Condition D was never exited, the

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TS usage rules require the Completion Time to restore the 2A pump to OPERABLE status be based on the initial entry of the Condition for the 2B NSCW transfer pump, plus an additional 24 hours for the subsequent system inoperability. Based on this, Condition E is to be entered for the inoperable 2A NSCW transfer pump on December 24, 2016 at 0200 EST.

This exigent amendment is requested to allow for the removal and repair of the 2A NSCW transfer pump. It is necessary to remove the pump and perform repairs due to the failure. Currently, TS 3.7.9, Condition E is set to be entered on December 24, 2016 at 0200 EST. Additional time is needed because of the complexity of the repair. The possible repair timeline as of December 12, 2016 is as follows:

- Decouple motor and perform uncoupled run – Complete
- Remove electrical connections – Complete
- Perform Diving Inspections – Complete
- Remove seismic restraints within the cooling tower – Complete
- Remove pump from the cooling tower via a roof plug – Complete
- Send pump off site for repair – 520 hours
- Install repaired pump in the cooling tower – 72 hours
- Perform Diving Inspections – 16 hours
- Mount motor to the pump casing – 8 hours
- Install seismic restraints within the cooling tower – 18 hours
- Install electrical connections – 5 hours
- Perform uncoupled run – 6 hours
- Couple motor to pump and align – 12 hours
- Perform Functional Tests and IST of motor and pump – 12 hours

From this timeline, the expected time to restore to OPERABLE is approximately 28 days from December 12, 2016. The proposed 77 day CT (which began November 7, 2016) for the NSCW basin transfer pump allows additional time as a contingency for unexpected circumstances. However, SNC will strive to return the pump to OPERABLE status in the minimal time achievable.

2.4 Proposed Technical Specification Change

The proposed change revises TS 3.7.9, Condition D and Required Action D.2.2.

Required Action D.2.2 has a Note above the Completion Time which currently states "A one-time change of the Completion Time to 46 days is permitted for the 2B NSCW transfer pump refurbishment during Vogtle Unit 2, Cycle 19. The increased Completion Time is applicable only to the 2B NSCW transfer pump." This Note is being revised to state "A one-time change of the Completion Time to 77 days is permitted until January 23, 2017 during Vogtle Unit 2, Cycle 19."

This one-time Note will expire once TS 3.7.9 Condition D is exited or after January 23, 2017, whichever is more restrictive.

3.0 Engineering Analysis

3.1 Defense-in-Depth

During the time the NSCW transfer pump is out of service, the required fans, basin level, and basin temperature will remain within the limits of the Technical Specifications. Consequently, should an event occur requiring the NSCW system and the UHS, either train will be capable of performing its safety function of providing cooling water, assuming no additional failures. This is inherent in the TS 3.7.9 D.2 ACTION itself, in that a compensatory measure for an alternate method of basin transfer is required; if such method is not available, the extended CT cannot be used. In such a situation, an 8 day CT would be in effect per TS 3.7.9 ACTION D.1. Based on the 2B NSCW transfer pump being declared inoperable on November 7, 2016, Unit 2 will be required to enter Condition E if an alternate method of basin transfer cannot be established.

3.2 Safety Margins

The proposed TS change is consistent with the principle that sufficient safety margins are maintained based on the following:

Codes and standards (e.g., American Society of Mechanical Engineers (ASME), Institute of Electrical and Electronic Engineers (IEEE) or alternatives approved for use by the NRC) are met. The proposed change is not in conflict with approved codes and standards relevant to the NSCW system.

The NSCW system and the UHS have sufficient capacity to function for design basis accidents. Assuming no additional failures, the FSAR acceptance criteria for the design events will be met should such an event occur during the time that the 2A NSCW transfer pump is out of service.

3.3 Compensatory Measures

To satisfy the requirements for TS 3.7.9, Required Action D.2.1, an alternate method of basin transfer has been implemented during repair of the 2A NSCW transfer pump. The alternate method utilizes a B-Train NSCW pump, the NSCW cross-tie fill connection, and a 6 inch hose staged for routing along the ground to the A-Train NSCW tower. This compensatory measure ensures that a 30-day inventory of NSCW water is available during a design basis accident.

A simplified drawing of the NSCW system, which shows the alternate method of basin transfer, is provided at the end of this enclosure.

The alternative means for 2A NSCW water transfer consist of routing a fire hose from the 2B NSCW Tower to the 2A NSCW Tower. The fire hose is connected to the 2B NSCW cross pumping flange and will be routed to the 2A NSCW Tower.

The detailed actions for the alternative transfer source are governed by a Temporary Configuration Change which will instruct maintenance personnel to implement the alternative source transfer in the field and give Operators clear instructional guidance in the event of an occurrence when the transfer system is called upon to perform its function. In addition, standing orders will be issued in the control room to promote awareness and to ensure expectations and guidance is understood by all oncoming shift operators.

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In support of the plant's readiness for implementing the alternative means for NSCW transfer, the fire hose will initially be connected to the flange for cross pumping. In the case of an event, doors will be propped open and the fire hose routed to the 2A tower in support of NSCW transfer.

No additional maintenance or operating training is required. The actions that will be performed in support of the alternative source for transfer are already governed by system operating training and initial maintenance training. The actions involved for implementing the alternative transfer source is connecting a fire hose to NSCW piping and valve manipulation to allow water flow to the 2A NSCW Tower.

3.4 Maintenance Rule Control

Since this is a one-time change, it is not expected that additional out-of-service time for the 2A NSCW transfer pump will adversely affect the performance of this pump or the NSCW system. The NSCW transfer pumps are included under the VEGP Maintenance Rule Program and function to transfer NSCW water between cooling water basins. Since the pumps' function is to operate during a design basis accident (DBA) and the pumps are on standby the majority of the time, Maintenance Rule unavailability hours are exempt. The pumps' reliability is tracked by quarterly IST testing. If adverse conditions exist, then IST testing is increased to monthly testing until the problem is identified and resolved. If the pre-established reliability performance criteria for the NSCW transfer pumps are exceeded, the pumps are evaluated for the 10 CFR 50.65(a)(1) actions, which requires increased management attention and goal setting in order to restore their performance to an acceptable level.

3.5 Risk

The risk will be low when the 2A NSCW transfer pump is inoperable during repair because Required Action 3.7.9.D.2.1 for the compensatory measures will be in place. Shutting down the reactor to repair the pump with the subsequent start-up would introduce unnecessary transition risk. The VEGP NSCW system and the Ultimate Heat Sink are modeled in the Probabilistic Risk Assessment (PRA model). However, the NSCW transfer pumps are not included in the PRA model. This license amendment has been reviewed with respect to risk for VEGP. There is no impact on the core damage frequency (CDF) or large early release frequency (LERF) as modeled in the PRA for VEGP as a result of this license amendment.

Existing capabilities provide reasonable assurance of successful water transfer by the necessary time, considering potential equipment problems that could broadly affect B-Train equipment (e.g., a fault in the B-Train electrical distribution system). Repair capabilities and available supplemental equipment to ensure successful water transfer are provided as follows.

Repair Capabilities: NSCW transfer would only be needed in the event of a Design Basis Accident. The additional exposure to failure of B-Train equipment resulting from the requested extension would be mitigated by the fact that the Emergency Response Organization would be activated with engineering and maintenance staff onsite around the clock. Any needed repairs would be completed expeditiously. Additionally, B-Train power would be protected per NMP-OS-010 for the duration of the extension and work would be limited to further ensure the reliability of B-Train power.

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Supplemental Equipment: If supplemental equipment were needed to transfer water from basin to basin an already identified pump (hydraulically driven submersible pump) with sufficient pump head and comparable flow is available onsite. This pump would be able to pump water from the bottom of either basin to the desired basin utilizing a separate already identified mechanical power source (diesel – hydraulic power skid). The use of supplemental equipment will be described in the operational guidance attached to the Temporary Configuration Change. This represents a defense-in-depth strategy which does not rely on like power sources to facilitate basin transfer.

4.0 Regulatory Analysis

4.1 Applicable Regulatory Requirements

The design of the NSCW system and the Ultimate Heat Sink satisfies the criteria of 10 CFR 50.36, "Technical Specifications", paragraph (c)(2)(ii), Criterion 3, which states the following:

"(ii) A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:

...

Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The NSCW system and the Ultimate Heat Sink are described in the VEGP FSAR Sections 9.2.1 and 9.2.5."

The design of the NSCW System and the Ultimate Heat Sink satisfies the requirements of 10 CFR 50, Appendix A, General Design Criteria 44 which states, in part:

Criterion 44 – Cooling Water

"A system to transfer heat from structures, systems, and components important to safety, to an ultimate heat sink shall be provided. The system safety function shall be to transfer the combined heat load of these structures, systems, and components under normal operating and accident conditions.

Suitable redundancy in components and features, and suitable interconnections, leak detection, and isolation capabilities shall be provided to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) the system safety function can be accomplished, assuming a single failure."

4.2 No Significant Hazards Evaluation

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company hereby requests an exigent amendment to Vogtle Electric Generating Plant (VEGP) Unit 2 Operating License NPF-81. The proposed change would revise Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.7.9, "Ultimate Heat Sink (UHS)", such that a 77 day Completion Time is allowed for

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Required Action D.2.2 for an inoperable nuclear service cooling water (NSCW) basin transfer pump. The TS changes would be a one-time change and in effect only until January 23, 2017.

Southern Nuclear Operating Company (SNC) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment", as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change does not alter any plant equipment or operating practices in such a manner that the probability of an accident is increased. The proposed changes will not alter assumptions relative to the mitigation of an accident or transient event. Furthermore, the ultimate heat sink (UHS) will remain capable of adequately responding to a design basis event during the period of the extended completion time (CT). Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different accident from any accident previously evaluated?

Response: No

The proposed change does not introduce any new or unanalyzed modes of operation. The repair of the pump does not involve any unanalyzed modifications to the design or operational limits of the NSCW system. The redundant pump and compensatory measures allowed by the Technical Specifications will remain unaffected. Therefore, no new failure modes or accident precursors are created due to the pump repair during the extended Completion Time. For the reasons noted above, the proposed change will not create the possibility of a new or different accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is related to the ability of the fission product barriers to perform their design functions during and following an accident. These barriers include the fuel cladding, the reactor coolant system, and the containment. The performance of these fission product barriers will not be affected by the proposed change; therefore, the margin to the onsite and offsite radiological dose limits are not significantly reduced.

During the extended CT for the NSCW transfer pump, the NSCW system and the UHS will remain capable of mitigating the consequences of a design basis event such as a loss of coolant accident (LOCA). Technical Specifications 3.7.9 Action D.2.1 will be taken to provide an alternate method of basin transfer.

For the reasons noted above, there is no significant reduction in a margin of safety.

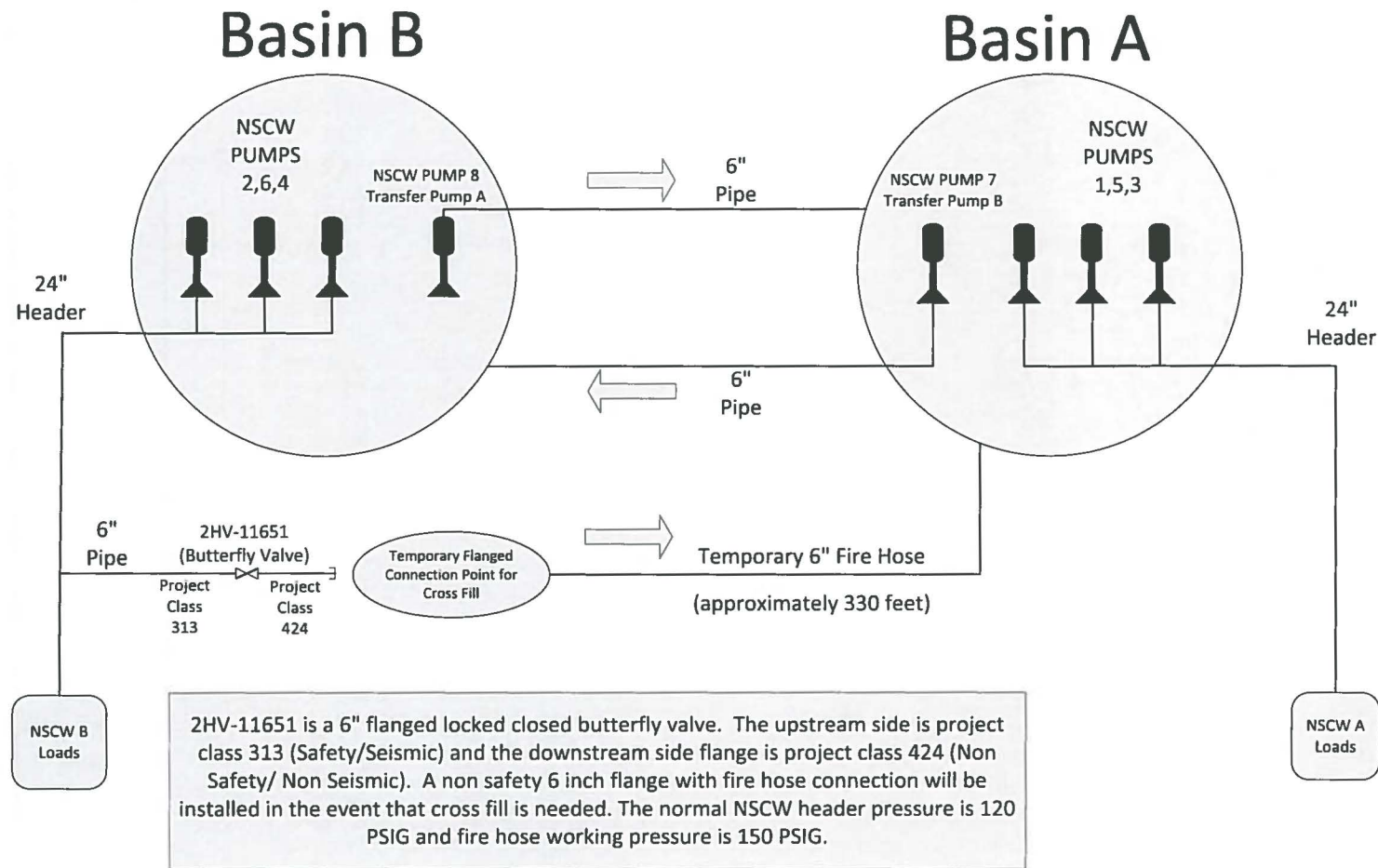
4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Assessment

SNC has evaluated the proposed amendment and has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released off site, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need to be prepared in connection with the proposed amendment.

VEGP Unit 2 Simplified NSCW Drawing



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Enclosure 2

Marked-Up Technical Specification Page

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One NSCW basin transfer pump inoperable.	D.1 Restore the transfer pump to OPERABLE status.	8 days
	<u>OR</u>	
	D.2.1 Implement an alternate method of basin transfer.	8 days
	<u>AND</u>	
	D.2.2 Restore the transfer pump to OPERABLE status.	<p>-----NOTE----- A one-time only change of the Completion Time to 46 <u>77</u> days is permitted <u>until January 23, 2017</u> for the 2B NSCW transfer pump refurbishment during Vogtle Unit 2, Cycle 19. The increased Completion Time is applicable only to the 2B NSCW transfer pump.</p> <p>-----</p> <p>31 days</p>
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	E.2	<p>-----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4.</p> <p>-----</p> <p>Be in MODE 4.</p> <p>12 hours</p>
<u>OR</u>		
UHS inoperable for reasons other than Conditions A, B, C, or D.		

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Enclosure 3

Clean-Typed Technical Specification Page

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One NSCW basin transfer pump inoperable.	D.1 Restore the transfer pump to OPERABLE status.	8 days
	<u>OR</u>	
	D.2.1 Implement an alternate method of basin transfer.	8 days
	<u>AND</u>	
	D.2.2 Restore the transfer pump to OPERABLE status.	<p>-----NOTE----- A one-time only change of the Completion Time to 77 days is permitted until January 23, 2017 during Vogtle Unit 2, Cycle 19. -----</p> <p>31 days</p>
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	<u>OR</u>	
	UHS inoperable for reasons other than Conditions A, B, C, or D.	
	E.2	<p>-----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. -----</p> <p>Be in MODE 4.</p>
		12 hours