

1    **Q.     Reference: At page 63 of the report, Liberty states that “The loss of two systems**  
2       **from the same fault constitutes a ‘common mode failure.’”**

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4       **a)   Please indicate what “fault” Liberty suggests constitutes a “common mode**  
5       **failure”.**

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7       **b)   If the answer to (a) is “Holyrood’s isolation from the system”, please describe**  
8       **Liberty’s understanding of how Holyrood became isolated from the system for**  
9       **the applicable situation.**

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12    **A.     Liberty responds to the question’s two parts as follows:**

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14       a)   As a clarification, Liberty intends “fault” to mean any event that causes a failure and  
15       not necessarily an electrical fault.

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17           The discussion on Page 63 of the report refers to a hypothesized blackout situation in  
18           which the unit is separated from the system. As stated on page 63, the theorized  
19           single event that would render two of the three lube oil supplies inoperable is a loss  
20           of offsite power.

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22       b)   The theorized loss of offsite power and isolation of the unit could occur from a  
23       variety of circumstances, including those that happened in January 2014.