

Alexander Marion DIRECTOR ENGINEERING DEPARTMENT NUCLEAR GENERATION DIVISION

October 18, 2001

Mr. Eric W. Weiss Chief, Plant Systems Branch Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop O11-A11 Washington, DC 20555-0001

## SUBJECT: NEI 00-01, Guidance for Post-Fire Safe Shutdown Analysis

## **PROJECT NUMBER: 689**

Dear Mr. Weiss:

Enclosed is a copy of NEI 00-01, Draft Revision C, *Guidance for Post-Fire Safe Shutdown Analysis*, for your information. We have revised the previous version (Draft Revision A) provided to you in April 2000, and anticipate further revisions before our final submittal later this year. This document contains no proprietary information and can be made publicly available.

Please note that we have not yet addressed in Draft Revision C the informal NRC comments received to date on Draft Revision A. We intend to systematically address these comments prior to final submittal of NEI 00-01. While we are not seeking formal NRC comment at this time, we are interested in any additional comments you care to provide before the final submittal. The schedule for this final submittal will depend on completion of the work of the expert panel formed to develop spurious actuation probabilities, completion of the NEI 00-01 pilots, and analysis of the results of the EPRI/NEI testing.

The principal revisions in Draft Revision C are in the following areas:

- Section 1, "Introduction": This section discusses the overall method and its intended use.
- Section 4, "Risk Significance Analysis": Section 4.1 describes circuit selection, qualitative pre-screening, and defense-in-depth and safe shutdown analysis. Section 4.2 addresses risk significance screening. Section 4

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supercedes Appendices G and I in Draft Revision A.

- Appendix B includes information formerly placed in Appendix C (Sections C.4.1 and C.4.2) and Appendix E. Appendix B.3 is reserved for future use.
- Appendix E is the former Appendix F, and addresses manual action and repairs.
- Appendix F includes supplemental methods for selecting circuits to be evaluated using NEI 00-01. These criteria are intended at this time only for evaluation in the NEI 00-01 pilots. The results of the pilots will help industry determine whether these selection methods should be used on a broader scale.
- Appendix G provides event trees supporting the qualitative screening methods in Section 4.1.

Minor changes reflecting PWR systems are included in Section 3.

We appreciate NRC participation in the industry activities leading to completion of NEI 00-01. These activities include the EPRI/NEI circuit failure testing, the expert panel, and the NEI 00-01 pilots. We look forward to a continuing interactions as we complete the document.

Please address any questions to Fred Emerson at 202-739-8086, fae@nei.org or me.

Sincerely,

Alex Marion

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FAE/maa Enclosure