



EPM

Engineering Planning and Management, Inc.

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 PROPOSED RULE **FR 50**
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Secretary, U.S. Nuclear Regulatory Commission
 Rulemakings and Adjudications Staff
 Mail Stop O-16C1
 Washington, DC 20555-0001

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

SUBJECT: COMMENTS ON DRAFT RULE WORDING FOR 10 CFR PART 50.48

Gentlemen:

The requirements and methods for performing safe shutdown analysis has been the most controversial issue in the nuclear industry, and thus far, not addressed. NFPA 805 has established clear requirements and guidelines for performing safe shutdown analysis.

Currently the rule (10CFR 50.48) requires plants that were licensed prior to January 1979 to comply to the requirements of sections III.G, III.J and III.O. These sections of Appendix R deal specifically with safe shutdown analysis.

It is recommended that the proposed fire protection rule be revised to allow the licensee to adopt NFPA 805 as an alternative to CFR 50.48 for compliance to Appendix R sections III G, J and O only.

This essentially will allow the licensee to utilize the methods and guidelines established in the standard to perform their entire safe shutdown analysis. And will enable the NRC an easy way of assessing compliance.

The proposed change will not create additional regulatory or licensing confusion since, either the plant will be in compliance to Appendix R sections III.G, III.J and III.O or to the portions of the standard that deals with safe shutdown analysis.

Should you have any questions regarding the above comments, please do not hesitate to call me at 508-875-2121 X203.

Very truly yours,

Robert Kalantari
 Engineering Services
 Division Manager

RBK/jns

cc: Leon Whitney

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