



NUCLEAR ENERGY INSTITUTE

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

SUBJECT: Response to the NRC Comments on NEI 00-01

PROJECT NUMBER: 689

Dear Mr. Hannon:

In March you provided extensive comments on Draft Revision C of NEI 00-01, "Guidance for Post-Fire Safe Shutdown Analysis." We appreciate the thorough review of the document that is reflected in these comments. Our responses to these comments are provided with this letter.

Because a number of the comments addressed the same basic issues, we developed position papers more thoroughly explaining the industry views on these issues, and provided them as attachments to the enclosed response:

- Definition of "free of fire damage"
- Manual actions
- Spurious actuation of non-safe shutdown equipment
- Multiple spurious actuations
- Role of NEI 00-01 in the licensing basis
- Defense-in depth considerations
- Preliminary screening criteria
- PWR issues

The intended purpose in developing the risk-informed methods of NEI 00-01, is to resolve interpretive differences related to the postulation of multiple hot shorts, multiple spurious actuations, and failures of the type discussed in Information Notice 92-18. The NRC position on these issues was documented in its letter of March 11, 1997, and the industry position in an NEI letter of May 30, 1997. NRC convened a workshop in July 1997 where industry proposed, and NRC accepted the risk-informed initiative to resolve these issues that led to NEI 00-01.

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The basic premise behind NEI 00-01 is that these potential circuit failure issues should be addressed by licensees if they are determined to be risk-significant. If not, industry and NRC should not expend significant resources analyzing and addressing non-safety significant issues. This premise is similar to the basic purpose of the Reactor Oversight Program and its use of the Significance Determination Process.

With this in mind, an NRC focus on the assumptions of the deterministic methods of Chapter 3 of NEI 00-01, without considering the use of the risk significance analysis in Chapter 4, is inappropriate. Specifically, the NRC should not continue to insist that the deterministic method in Chapter 3 adhere to the NRC interpretations of cognizant regulatory guidance discussed in the March 11, 1997, letter. These deterministic methods reflect plant practices approved by NRC and adopted into plant licensing bases. Whether or not the assumption of multiple simultaneous hot shorts is "required" by regulatory guidance is less important than the degree to which they impact plant safety, and the plant response is basically the same for significant potential failures regardless of the interpretation of the regulatory guidance. NEI 00-01 provides appropriate methods for addressing clear-cut compliance issues as well as interpretive differences.

We will provide you with the next draft of NEI 00-01 in October. This draft will provide update information reflecting:

- NRC comment responses
- A detailed analysis of the results of EPRI/NEI circuit failure testing
- The results of an expert panel convened to develop probabilities of spurious actuation
- The results of two pilot evaluations of the NEI 00-01 methods
- An updated technical basis for the current industry position on multiple high impedance faults.

We look forward to completing and submitting NEI 00-01, and its timely acceptance as a risk-informed method for resolving circuit failure issues.

If you have any questions or comments please contact Mr. Fred Emerson at 202-739-8086, fae@nei.org, or me.

Sincerely,



Alexander Marion

FAE/maa
Enclosure

c: Ms. Suzanne Black, U. S. Nuclear Regulatory Commission
Mr. Eric Weiss, U. S. Nuclear Regulatory Commission