

February 11, 2003

MEMORANDUM TO: Christopher I. Grimes, Director  
Policy and Rulemaking Program  
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager */RA/*  
Policy and Rulemaking Program  
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF FEBRUARY 4, 2003 MEETING WITH NUCLEAR  
ENERGY INSTITUTE TO DISCUSS STAFF COMMENTS ON NEI 00-01  
"GUIDANCE FOR POST-FIRE CIRCUIT ANALYSIS"

On February 4, 2003, Nuclear Regulatory Commission (NRC) staff met with representatives of the Nuclear Energy Institute (NEI) and industry in a public meeting to discuss staff comments on NEI 00-01. Those attending the meeting are listed in Attachment 1. NRC staff comments were sent by letter dated December 16, 2002 and are in Attachment 2 (ADAMS Accession No. ML023500247).

After introductions by the NRC, Fred Emerson, of NEI, discussed NEI's purpose for the meeting. He indicated the purpose was to (1) prepare for the February 19, 2003 workshop on circuit analysis, (2) achieve closure on staff comments on NEI 00-01 so as to be able to have an acceptable version, (3) clarify the role of the draft NUREG-CR on circuit analysis, and (4) discuss schedule for future NEI 00-01 efforts.

NEI asked the purpose of the draft NUREG-CR recently issued by the staff. The staff stated that the NUREG-CR, "Methodology for Post-Fire Circuit Analysis," is a compilation of background information and definitions for the circuit analysis issue and the draft was issued in support of the February 19 workshop. NEI pointed out that the title of the draft NUREG-CR, was identical to NEI 00-01 and did not reflect the content of the NUREG-CR. The staff agreed to change the title to be consistent with the content of the NUREG-CR.

NEI then discussed the five comments on NEI 00-01 from the staff's December 16, 2002 letter. Key issues in the comments were the need for the methodology to address the effect of failures in nonessential circuits on circuits necessary for post-fire safe shutdown. The staff felt that NEI 00-01 needed a step to identify high-consequence nonessential circuits. NEI agreed to consider wording to address this aspect of circuit failures. The next issue concerned fire-effects on circuits other than cabling such as inside a motor control center (MCC). NEI agreed that the testing performed did not include this aspect of circuits but NEI said that if high-risk conditions were identified inside MCCs they should be fixed. There was some discussion as to whether there was a need to fix high-risk conditions that were not in the current licensing basis. NEI said NEI 00-01 indicated that high-risk conditions should be fixed regardless of the licensing basis and that NEI understood the staff's concerns for this area. The next staff concern was that NEI 00-01 could be understood to allow feed and bleed as a sole method of achieving safe shutdown. NEI said this was not intended and that they would consider the wording in NEI 00-01 to make this clear. The staff then pointed out a concern for Table 4.1 of NEI 00-01.

The staff felt the table screened out from further consideration potential high-consequence events based on credit for automatic suppression, detection, manual suppression or safe shutdown capability. NEI pointed out that Table 4.1 was a qualitative process to be used conservatively to screen obvious low-risk circuits and to pass on high- and medium-risk circuits for quantitative analysis. NEI said that experience showed the table did not screen out high-risk circuits. However, the staff believes there may be a weakness in using such a qualitative approach. NEI said they understood the staff's concern.

The staff's last comment concerned the potential use of NEI 00-01 as a risk-screening tool that may be used as guidance for focusing inspections, prioritizing corrective actions, or finding the proper significance determination process color. The staff also thought that an approved NEI 00-01 could be used to support exemptions or deviations and, in the future, be used under NFPA 805 if the proposed rule is adopted. NEI agreed that NEI 00-01 may be used to support such actions.

Eric Weiss asked about NEI's actions regarding staff comments on draft C of NEI 00-01. Mr. Emerson indicated that, in a September 11, 2002 letter to NRC (ADAMS Accession Nos. ML030410105 and ML030410077), NEI identified the changes made to NEI 00-01 for the comments NEI agreed with and provided response or justification for the comments they did not agree with. There was a brief discussion on the status of the comments.

There was a question on how licensees consider spurious actions to occur per fire event. NEI indicated that licensees consider them to occur one at a time. There was a discussion on this but no agreement on the issue was reached.

Having completed discussion of the agenda items, the meeting was adjourned.

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Attachment: As stated  
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Nuclear Energy Institute

Project No. 689

cc: via e-mail (use MS Word if available)

Mr. Alex Marion, Director  
Engineering  
Nuclear Energy Institute  
am@nei.org

Fred Emerson, Sr. Project Manager  
Nuclear Energy Institute  
fae@nei.org

**MEETING on STAFF COMMENTS ON NEI 00-01  
METHODOLOGY FOR POST-FIRE CIRCUIT ANALYSIS**

**LIST OF ATTENDEES  
February 4, 2003**

<u>NAME</u>	<u>ORGANIZATION</u>
Eric Weiss	NRR/DSSA/SPLB
Dan Frumkin	NRR/DSSA/SPLB
Mark Henry Salley	NRR/DSSA/SPLB
Phil Qualls	NRR/DSSA/SPLB
Ken Sullivan	BNL
*Steve Nowlen	SNL
Joe Birmingham	NRR/DRIP/RPRP
J.S. Hyslop	NRC/RES/PRAB
Amarjit Singh	NRC/RES
Chip Cameron	OGC
Fred Emerson	NEI
Tom Gormon	PPL Susquehanna, LLC
Nancy Chapman	Serch/Bechtel
Deann Raleigh	LIS, Scientech

\* via teleconference