



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 19 1984

MEMORANDUM FOR: Harold R. Denton, Director, ONRR
Richard C. DeYoung, Director, OIE

FROM: Richard H. Vollmer, Chairman
Fire Protection Policy Steering Committee

SUBJECT: THIRD MEETING OF THE FIRE PROTECTION POLICY STEERING
COMMITTEE, HELD ON OCTOBER 2, 1984

Summary

At its third meeting the Fire Protection Policy Steering Committee (SC) met with the fire protection engineers from HQ and the Regional Offices to obtain their candid views on licensing and inspection fire protection issues. Comments were presented by fire protection engineers from NRR, IE, and Regions I, II, III, and IV. In addition, Jane Axelrad discussed the proposed fire protection enforcement policy with the SC. Highlights of these comments and ensuing discussions are as follows:

- The responsibility for fire protection was viewed as fragmented since CMEB, ASB, LQB, and QUAB in HQ are involved in addition to Regions. Commentors believed a central point of contact is needed in HQ;
- The fire protection guidelines and scope of Tech Specs were considered by some to be inconsistent and inadequate, and a list of "minimum requirements" for fire protection was requested;
- Regional inspectors indicated need for an enforcement policy and for policy on QA for fire protection;
- Need for control room electrical review policy was indicated; and
- Comments were voiced for and against use of the "interpretations."

This meeting was very helpful to the SC in better defining the issues and clarifying where action was most needed. However, the SC indicated it would not be able to resolve or even address all of the issues raised. Of particular note was the attitude expressed by the fire protection engineers of a desire to resolve the issues promptly and of a willingness to support the recommendations of the SC. A list of attendees is provided in the enclosure.

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Enclosure to GL 85-01, Re: Fire Protection Policy

OCT 19 1984

The SC believes that its previous decision on expediting plant inspections was reinforced by the comments in this meeting. The SC indicated its view that inspections should go forward rapidly to get on with the identification and resolution of problems. To require more documentation in areas not specifically required by the Rule would slow compliance down.

Discussion

1. Views expressed by fire protection engineers.

Region I discussed the inspections of Vermont Yankee, Salem and Calvert Cliffs. It was indicated that confusion generated was caused by differences between Generic Letter 83-33 and "interpretations" but that the Region endorsed the interpretations because they would expedite the process and not create inspection problems. The implementation of Appendix R at Calvert Cliffs was successful because the licensee did a very thorough evaluation of his alternate shutdown needs, had substantial communication with the licensing staff, had some unit-specific features which benefitted shutdown, and had support of licensee management. Other comments made by Region I were that: (a) Vermont Yankee was confused by the Appendix R implementation letter, (b) at Salem the inspection was complicated because many exemptions were needed just prior to the inspection as a result of 83-33, and (c) all Region I licensees appear to be taking Appendix R seriously and making good faith efforts.

Region II discussed their experience with Appendix A and Appendix R. They saw Appendix R and fire protection as a moving target in particular since different utilities take different approaches and when these are accepted in licensing, confusion in the inspection process results. They also noted that utilities were concerned that NRC was going beyond reactor safety and getting into loss prevention. Region II raised an issue, generally endorsed by others in the meeting, that the responsibility for fire protection is fragmented because of all the disciplines responsible. In particular, in NRR responsibility lies in engineering, systems interaction and human factors safety. Licensing work also resides in the Quality Assurance Branch in IE. This, along with different Regional views and inspector approaches, results in confusion and inconsistency. It was suggested that a central contact was needed at HQ to provide central authority for fire protection. It was also indicated that reviewers and inspectors need additional guidelines, in particular, minimum acceptance criteria. Region II also pointed out differences in license requirements and Tech Specs dealing with fire protection. A discussion evolved concerning the need for augmenting Tech Specs in relation to other safety significant items. The general consensus of the fire protection engineers was that Tech Specs needed to be expanded in this area.

OCT 19 1984

Region II also indicated that guidance for inspectors needed revising and expansion and that an inspection module was needed for NTOLs. It was also pointed out that the fire protection inspection must be done early in the inspection phase when the licensee has the opportunity to make changes. It was suggested that Regional inspectors accompany NRR reviewers in their site visits and that a general improvement in communication and understanding of SER commitments was needed. Finally, Region II voiced the view that the definition of fire areas in 83-33 must be retained, that guidance is needed for suppression systems and intervening combustibles, reiterated that the inspection module needs improvement by supplying minimum acceptance criteria, and stressed the need for an enforcement policy in this area.

Region III generally endorsed the comments of Region I and II. In addition, they pointed out the need for QA guidance in the area of fire protection. They stated that deficiencies in Tech Specs resulted from omission of fire damper surveillance, and inconsistencies of Code requirements. It was suggested that the present inspection modules be combined into one for all plants. Region III indicated that they felt the need to explain the rule requirements to industry; for example, 20 feet separation. They requested that RES be tasked to supply the technical basis. They felt that inspectors needed such information to guide them in making judgments and evaluations. The SC pointed out that the items in the rule were based on the best information at the time and that inspectors needed not feel obligated to explain rule obligations to licensees. If there are areas where the inspector feels safety is not well served by meeting rule provisions, such concerns should be elevated to management but that the rule, including its defense in depth provisions, seemed adequate. Finally, Region III indicated that the three things most needed were: (1) enforcement policy, (2) minimum requirements, and (3) consistent levels of inspection. To take care of (3), a training program would be needed. When asked, Region III cited the following as their three biggest frustrations: (1) the adequacy of licensee analyses, (2) the adequacy of regulatory requirements, and (3) the inconsistent reviews and inspection criteria.

Region IV has inspected Fort Calhoun, Fort St. Vrain and some NTOLs. They endorsed most of the comments of the previous Regions. In particular, they felt the need for acceptance criteria, enforcement policy, and up-to-date Tech Specs.

Brookhaven National Laboratory (BNL) commented on problems with specific compliance vice meeting the "intent" of Appendix R. In particular, NTOLs allege that they meet the intent of Appendix R through a number of

OCT 19 1984

different ways. BNL indicated that there were serious problems with consistency and interpretation of control room fires and that we lack the rationale or basis for these views. They question in particular how long is the control room habitable, what action can be taken, where two units share a control room are both units affected, and must both units shut down outside the control room. BNL also stated that we needed specific guidelines for associated circuit analysis and indicated that the SER was not always a reliable indicator of licensing commitments for inspection.

A representative of ASB indicated the scope of review for alternate shutdowns and that the criteria used were consistent and had been in use for most plant reviews. The criteria were not well documented however. He expanded on the systems used for safe shutdown, the requirements for physical separation and electrical separation for safe shutdown. With respect to the associated circuits analysis it was indicated that the evaluation assured, assuming offsite power loss, that safety could be demonstrated assuming one spurious signal, a loss of all automatic signals, and spurious operation of motor-operated valves in the high/low pressure interface. It was indicated that this included review of licensee's summary of operator actions and that, during inspection, the actual procedures are walked down.

IE's discussion focused on item 3 of the "interpretations" which states that licensees must show equipment must be "free of fire damage" before, during and after a fire. He was concerned that although Section III.G.2 specifies free of fire damage, the interpretation would allow less than this, in particular, scorched and severely heated equipment which are still barely sufficient to perform their intended functions. He said that the rule language would not allow this and that it is not appropriate and conservative.

In many of the above comments from Region and HQ representatives the SC detected a belief of bad faith by the licensees and practices which would subvert the spirit and the technical intent of the Commission's requirements. The SC pursued this to some extent but noted that there seemed to be a lack of specifics. Since the importance and safety significance of each requirement was somewhat judgmental the SC felt that the NRC needed to shoulder some responsibility for lack of compliance because of the evolution of Appendix R.

NRR representatives indicated their belief that the NRC should stick with the Generic Letter 83-33 approach, which in their view has been working, and issue enforcement policy. They felt that if the licensees were required to submit for review their entire program, both how they

OCT 19 1984

meet Appendix R as well as deviations or exemptions, there would be fewer inspection and enforcement problems, fewer citations and a better overall fire protection image. They pointed out that, if the licensee's evaluation is kept in house and not docketed under oath, it could be inaccurate.

The NRR representatives stated that the practical effect of the interpretations would be to relax requirements because an additional burden is placed on reviewers and inspectors that changes to licensee fixes are needed. They also asked for the agency to characterize the priority of fire protection in plant safety.

2. Views of IE enforcement staff.

Jane Axelrad discussed the current policy and indicated that it has not yet been issued because of a lack of general policy on what constitutes compliance with the rule. She gave background on the enforcement policy and comments on efforts to apply policy consistently across the regions. The SC indicated that it would provide its revision of the enforcement policy guidance for EDO approval.



Richard H. Vollmer, Chairman
Fire Protection Policy Steering
Committee

Enclosure: As stated

cc: W. Dircks
V. Stello
R. Minogue
T. Murley, R-I
J. O'Reilly, R-II
J. Keppler, R-III
R. Martin, R-IV
J. Martin, R-V
G. Cunningham
E. Case
J. Taylor
D. Eisenhut
R. Bernero
G. Arlotto
F. Rosa
SC Committee

Enclosure to GL 85-01, Re: Fire Protection Policy