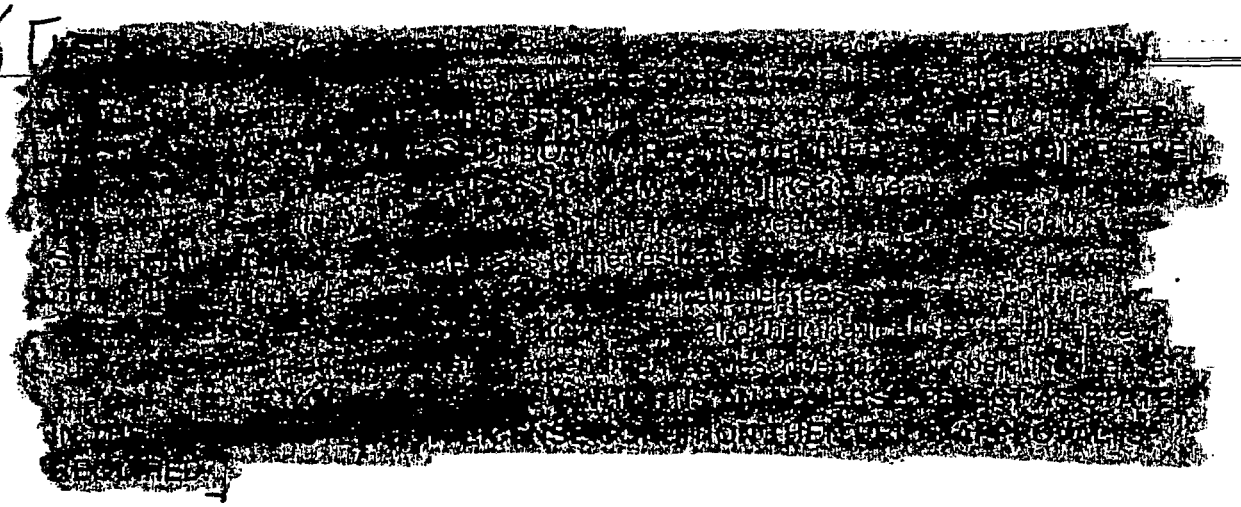
Fire Protection Issue At River Bend

1. What did the NRC approve in the license or SER regarding the protection or lack of protection for the SSW in Fire Area PT-1?

- The operating license refers to Attachment 4 of the license as designating the requirements of the Fire Protection Program at River Bend. Attachment 4 refers to the FSAR as well as the SER dated May 1984 and Supplement 3 dated August 1985.

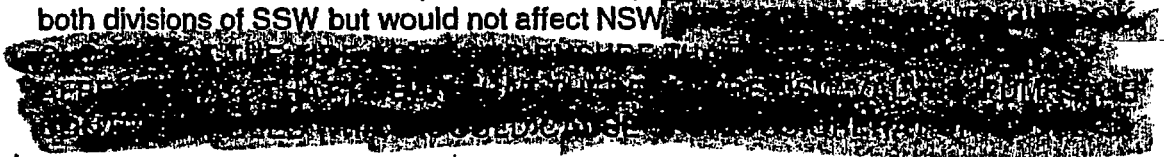
- The SER dated May 1984 identified that the Safe Shutdown Capability review was in progress and would be addressed in a supplement to the SER.

- Supplement 3 to the SER dated August 1985 addresses Safe Shutdown Capability in one of its sections. This section identifies the fire area in question (PT-1) as an area where no area wide automatic fire suppression equipment was provided. Both divisions of SSW cabling run through this area. The fourth paragraph of this section states that there is, "...a 1-hour fire rated barrier around one shutdown division". This paragraph also states, "Also, because one shutdown division is protected by a fire barrier, there is reasonable assurance that safe shutdown could still be achieved and maintained. Therefore, area wide automatic fire suppression is not necessary". This condition has not been true for River Bend for fire area PT-1 since the thermo-lag issue in 1991.



2. What does the licensee have to do to use the NSW as a backup to SSW if a fire disables both trains of SSW? If using NSW is a simple turning of a switch then the licensee is probably OK and would not need an exemption.

- The question may require more in-depth research than simply addressing the ease with which NSW can be used. NSW is their normal cooling water method. SSW is their "onsite powered" safe shutdown system dedicated to cooling necessary plant loads following an accident where offsite power is not available. If you don't lose offsite power, then NSW would be utilized. The whole premise of their position is that a fire in PT-1 could take out both divisions of SSW but would not affect NSW



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[redacted] and would not cause a loss of offsite power. Therefore, they want to consider NSW as the "redundant" safe shutdown system to SSW (a function for which it was not designed). This was not an approach previously reviewed by NRC for Safe Shutdown Capability in the SER. **(REDUNDANT, III.G.2, SSD DOES NOT REQUIRE THAT A LOOP BE ASSUMED UNLESS A FIRE IN THE AREA COULD CAUSE A LOOP)** [redacted]

- **ONE OTHER THING TO CONSIDER IS WHAT THE OPERATORS HAVE TO DO TO GET NSW ONLINE. MANUAL ACTIONS ARE A DEFINITE CONCERN. THE FILE THAT I ATTACHED IS MY DISCUSSION OF MANUAL ACTIONS FROM OUR RECENT (RAY DIDN'T BOTHER TO GO) COUNTERPART MEETING AND IS PUBLIC AS WE HAD TO GIVE A COPY TO NEI. THE LAST EXAMPLE ON THE LAST PAGE THOUGH IS MY CONCERN.**

- The resident writeup you already have is more detailed and explicit in the situation here and the types of questions we have regarding the River Bend Safe Shutdown Capability. **I DON'T RECALL SEEING THIS EITHER.**