

From: Rebecca Nease
To: Proulx, David
Date: 6/9/03 11:31AM
Subject: Re: Review of Manual Actions for DC Fire Protection

Thanks for the head's up, David. You're doing a great job of keeping them honest on these FP issues.

They may have a point with [REDACTED] In fact, if you look at NUREG-1409, "Backfitting Guidelines," there is a pseudo definition [REDACTED] As the logic goes: If the licensee submitted a proposal on the docket AND [REDACTED]

[REDACTED] We had this very same [REDACTED] The violation was upheld mostly because ANO could not prove that they had clearly submitted their methodology.

FYI: I will be performing the Phase 2 on your (very complicated and very good) ASD issue this week. I need to follow the process, however broken, the best I can. I will then present the risk to the SRAs for approval. To do this, I need the ignition frequency of the cabinets in which the circuitry-of-interest reside. I believe you have already provided this information in an e-mail to the SRAs with a cc to me. I'll keep you posted on my progress.

Again, thanks for keeping me informed.

>>> David Proulx 06/03/03 12:07PM >>>

The licensee came to me today and presented an NRC letter that "proved" NRC has previously approved of all of their manual actions in a fire scenario. The licensee applied for an exemption to Appx R so that they could take credit for flashlights in lieu of 8 hr. emergency lights. As a companion to this request, the licensee submitted their safe shutdown analysis to show where the flashlights would be needed. The NRC reviewed this application and denied the exemption to do without emergency lights.

The licensee taking the very tenuous position that because they included the safe shutdown package with the emergency lighting request, the NRC gave tacit approval for the manual actions as well.

[REDACTED]

I will forward (fax?) the letter to you (Rebecca) for your take on it as well [REDACTED]

DP

CC: Jones, William B.

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