

James Bongarra FROM: RULEMAKING PLAN FOR FP MANUAL ACTIONS

From: James Bongarra
To: David Trimble
Date: 1/6/03 4:05PM
Subject: Fwd: Re: RULEMAKING PLAN FOR FP MANUAL ACTIONS

Dave:

I have looked over the materials, to some degree (unexpected electrical contractor problems proved distracting as well as irritating!)...bottom line is that the fire protection people are proposing rulemaking and interim enforcement actions to address concerns that they have because licensees are relying on unauthorized/compensatory manual actions to assure safe shutdown during a fire rather than by providing separation and certain fire protection systems as protection for redundant trains located in the same fire area. They are proposing to develop generic guidance and acceptance criteria for these types of manual actions. They acknowledge that this is not being treated as a Generic Issue and that this is not an immediate safety concern but more of a non-compliance issue and situation where licensees are taking unauthorized actions that may not be feasible. My recommendation is that we continue to be involved with this....we have been identified as a member of the NRR support staff already. These is a meeting of all the players on Monday 1/13 which I indicated that I would attend. I think this effort on the part of the fire protection people has merit but....I think also, there may be a good deal of resistance on the part of the industry (of course) and the Commission. It is unclear that, for example, the ANSI 58.8 guidance on safety-related operator actions has been considered as applicable or "tailorable" (if that's even a word!) to the fire protection environment which it may well be. In addition, our draft guidance on manual actions may be applicable to/cover the fire protection concerns. Also, I think we need to make certain that the manual action concerns specific to fire protection aren't already addressed by more generic and existing guidance (although the proposed Plan does acknowledge the applicability of 10CFR 50.59 process yet the processes is lacking). If possible, I'd like to discuss this with you in more detail when I return to the office tomorrow.

Jim

>>> David Trimble 01/06/03 07:15AM >>>
Thanks, Jim.

>>> James Bongarra 01/03/03 05:05PM >>>
Dave:

I have copied the proposed rulemaking materials from ADAMS. I will look it over by Monday and give you my thoughts. As Phil Qualls stated, I did have a look at a very early draft of some of the materials some time ago but, I couldn't tell you that what I looked at is the same stuff given the length of time that has passed.

Jim

>>> David Trimble 01/03/03 07:43AM >>>
fyi.

CC: Goodman, Clare

D/22