

**From:** Peter Koltay *PK*  
**To:** Eric Weiss; John Hannon; Leon Whitney; Phil Qualls; Roy Mathew  
**Date:** 8/9/02 4:05PM  
**Subject:** IIIG2

*Release*

Doug Coe and I will be on annual leave next week and in order to keep the process moving we propose the following:

Please get OE support on providing relief from the requirements of IIIG2, introduction of manual actions in lieu of meeting fixed protection requirements as stated in IIIG2.

As soon as OE states that the proposed language is acceptable Jim Isom, acting for Doug, will E-mail the proposed change to the regional division directors for comments.

Jim will discuss the regional comments with you and develop the final language. It will be included into the inspection procedure.

**CC:** James Luehman

*H/7*

Determine whether the licensee has introduced manual actions in order to meet the requirements of 10CFR Part 50 section 11IG2 (e.g. while compensating for the disqualification of the use of thermo-lag as a fire barrier).

Identify two sample areas (if more than one) where licensee uses manual actions in lieu of required 11.G.2 fire barriers and assess the effectiveness of such actions.

If the manual actions are feasible as described in the licensee's procedure(s) but the licensee failed to notify the NRC of the substitution of manual actions in place of fixed protection, treat the failure to notify the NRC of the change in methodology as a minor finding in accordance with IMC 0612.

If the manual actions as described in the procedure(s) do not have supporting analyses (e.g. operability evaluation in accordance with Generic Letter (GL) 91-18 Revision 1) treat the issue as unresolved pending the completion of an evaluation.

If the manual actions supported by licensee evaluation cannot be accomplished as described in the licensee's procedure(s) treat the finding as a failure to meet the requirements of 11IG2 and follow the guidance in IMC 0609 and IMC 0612.