

35.6

NRC PROPOSED RESPONSE:

No. As a general rule, if a support system is not capable of providing its support function to one or more monitored systems, then the monitored systems incur unavailable hours. However, since support systems are not held to the same standards as the monitored systems, in certain specific cases somewhat more credit for operator recovery actions can be allowed for those support systems. Each case is evaluated on its own merits. The two situations where this provision has been approved are documented in FAQs 301 and 302. Guidance is provided in the responses to these two FAQs on the requirements for approval. Note that there must be a specific failure mode identified in order to address these requirements. In both cases where this provision was approved, no diagnosis was required since the impact on the monitored system was obvious, as were the corrective actions - add inventory to, in one case, a diesel generator day tank, and in the other case, to a cooling water surge tank. See FAQ 289 for an example of a situation that was not allowed by the guidance. The guidance was never intended to allow an open-ended exclusion from counting unavailable hours of the monitored system for any failure of a support system, as this FAQ requests. Neither is it the intent of the guidance to allow a support system to be out for any length of time and only count unavailable time against the monitored system after two hours have elapsed, as the FAQ requests. In addition, the NRC does not encourage licensees to develop, nor does the NRC wish to review, detailed analyses to demonstrate that a monitored system will function for some period of time with a support system out of service. In the two approved cases, the analyses were simple, as described in the responses.

35.8

NRC PROPOSED RESPONSE:

No. NEI 99-02 guidance states that "the staffing must be considered in advance and an operator identified to take the appropriate prompt response for the testing configuration independent of other control room actions that may be required." Reliance on emergency operating procedures to direct an operator to restore the required function does not meet the intent of this guidance.