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**From:** Peter Koltay, HG  
**To:** Charles R. Ogle, R2  
**Date:** 9/9/02 10:14AM  
**Subject:** Re: SH IIIG2 compliance

While it appears that we cannot use SH as the poster example for handling MAs in conjunction with the existing IIIG2 requirements, it is helping us develop reasonable approaches to the issue.

>>> Charles R. Ogle 09/09/02 09:16AM >>>

Peter, I really appreciate the call Friday with you and Dave. I also appreciate you all continuing to drive this to ground for us.

Just so that there is no confusion, the region has not verified the licensee's manual actions yet. Further, I am not sure that the licensee has analyses in place to support the manual actions they had drafted up. More importantly, the licensee has indicated that they may come up with alternate corrective actions. However, we will probably be able to still use the general strategy that you outlined to close the white issue while keeping the underlying violation open.

Specifically, the licensee has separate the ACP room containing the thermolag barrier from the Train B switchgear room. While the ACP room still contains Train A and Train B cables w/o the required separation, the reduction in ignition frequency (as a result of separating the Train B switchgear room and ACP) probably drives this issue below the green/white threshold. I am having Walt look at the numbers now.

Thanks.

>>> Peter Koltay 09/06/02 12:15PM >>>

Chuck,

I will not recap the SH issue. The NRR fire protection technical experts and their supervisor agree that MAs introduced by the licensee to meet the requirements of IIIG2 are acceptable based on regional assessment of the licensee's analysis on the feasibility of manual actions. Since such an assessment has been completed and the MAs found to be acceptable, the White level risk has been removed and in assessment space the White should expire with the specified time period. However, the licensee continues to be in violation of the regulations til one of the following occurs, exemption is granted (unlikely if not requested); returns to compliance (will probably not happen); discretion is granted once the rule change is under way (most likely, in planning stage). It is the opinion of OE ( Dave Nelson and Jim Luehman) that the violation should stay open with an associated risk level reduced to Green. The plan for initiating the rule making process for changing IIIG2 should be approved in approximately 60 days ? at which time the violation can be closed based on the enforcement discretion that will be outline in the rule making plan. I did not identify in the ROP guidance, 0609, 0612, or 0305, that would be contradicted by these actions. Any question please contact me before 2 pm today or Monday at any time.  
peter koltay

N/10