

**From:** Peter Koltay, NRR  
**To:** Phil Qualls; Robert Schin, NRR  
**Date:** 1/8/03 12:38PM  
**Subject:** Re: Operator Actions for Fire SSD

Please continue to follow the instructions in the draft procedure, that is identify acceptable manual actions as unresolved items pending rule change, the idea of replacing URIs with green findings is just a recommendation under discussion.

peter

>>> Robert Schin 01/08/03 12:03PM >>>

During the monthly Fire Protection phonecall today, you stated that NRR was considering advising the Regions to identify as GREEN violations (vice URIs) any operator actions, that were relied upon for hot shutdown, were to be performed outside of the control room, and were not approved by the NRC, but that inspectors judged would work.

Here is a question: When we identify operator actions as GREEN, are we stating that they they do not "adversely affect" safe shutdown? In view of the fact that some licensees have many such actions, some of which are complex, and in total these actions could represent a potentially significant increase in risk (as compared to fire barriers), will you get agreement from the PRA guys on the criteria for calling the actions GREEN?

**CC:** Charles R. Ogle; Charlie Payne; Rudolph Bernhard; Walt Rogers

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