

ANO Fire Protection Finding Summary

Inspection: Triennial Fire Protection; June 2001

Report: 50-313;368/2001-06; August 20, 2001

Finding: In Fire Zones 98J and 99M of ANO, Unit 1, the licensee failed to ensure that one train of cables, equipment, and components was free of fire damage by one of the three means specified in 10 CFR Part 50, Appendix R, Section III.G.2. In lieu of providing this protection, the licensee credited numerous manual actions for restoring fire-affected safe shutdown functions.

Backfit: ANO claimed the violation was a generic backfit. RIV held 2 backfit panels upholding the violation. NRR addressed the generic aspect of this finding, agreeing with RIV.

At issue: The requirements of 10 CFR Part 50, Appendix R, Section III.G.

III.G.1: fire protection features shall be provided for SSCs important to safe shutdown (SSD), and must be capable of limiting fire damage so that one train of systems necessary to achieve and maintain hot shutdown from either the control room or emergency control station(s) is free of fire damage.

III.G.2: where redundant SSD systems are located in the same fire area, one train of SSD systems (including associated circuits) must be free of fire damage by one of three methods:

- (a) separation by a 3-hr fire barrier;
- (b) separation by a horizontal distance of more than 20 feet with no intervening combustible or fire hazards. In addition, automatic fire detection and suppression system shall be installed; or
- (c) enclosure of one train in a 1-hr fire barrier. In addition, automatic fire detection and suppression system shall be installed.

III.G.3: where protection of SSD functions cannot meet III.G.2, alternative or dedicated shutdown capability must be provided.

ANO: ANO claimed that they are only required to meet Section III.G.1 which permits action at emergency control stations.

Generic: NRC has always permitted the use of manual actions as a method for meeting III.G.2.

Other licensees use manual actions for meeting III.G.2 without prior NRC approval.

Risk:

Phase 2 -

[Redacted]

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Phase 3 -

[Redacted]

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[Redacted]

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[Redacted]

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[Redacted]

Differences:

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Large Redacted Area]

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ANO FP ISSUE TIME LINE

June 11 - 22, 2001	Inspection
August 3, 2001	Exit - issue was characterized as a URI for compliance review and risk significance
August 20, 2001	Report - issue was a URI for compliance review and risk significance
August 31, 2001	Re-Exit - compliance review determined that the use of manual actions for achieving and maintaining hot shutdown conditions was a non-compliance with III.G.2
September 7, 2001	Phase 2 [REDACTED] S
September 10, 2001	[REDACTED]
September 28, 2001	Backfit - ANO claimed the violation was a backfit generic to all plants
October 26, 2001	Backfit Panel
January 11, 2002	NEI letter to NRR - generic aspect of using manual actions for complying with Appendix R, III.G.2
January 17, 2002	Backfit Panel - panel denied the backfit, and upheld the violation
April 15, 2002	Backfit Response to ANO - backfit was denied [REDACTED] S
May 16, 2002	NRR letter to NEI - addressing the generic position concerning the use of manual actions for complying with Appendix R, III.G.2.
August 20, 2002	[REDACTED]
September 25, 2002	[REDACTED] S
December 10, 2002	SERP [REDACTED]
January 24, 2003	Re-SERP [REDACTED]
March 21, 2003	IMC 0609.01 Issued - as requested by RIV, this revision permitted the choice letter to characterize the risk [REDACTED] S
March 25, 2003	Choice letter to ANO informing them the finding was GREATER-THAN-GREEN
April 2, 2003	Additional information requested- by ANO to be provided by April 11, 2003
April 11, 2003	Additional information provided - to ANO via overnight mail