

From: "Sullivan, Kenneth" <ks@bnl.gov>
To: "Russ Bywater" <RLB3@nrc.gov>
Date: 8/13/01 8:14AM
Subject: RE: ANO Appendix R Issues

Russ:

Thanks for the input. I offer the following:

One train of equipment required to accomplish PFSSD functions must remain free of fire damage. Examples of "required" equipment include pumps and valves located in a required flow-path. [REDACTED]

[REDACTED]
[REDACTED] A classic example would be control cables of a small flow diversion valve. It is clear that circuits/cables of "required equipment" (such as the BWST valves you discuss) must meet III.G.2 separation criteria. As evidenced from your example and the examples identified during the triennial inspection for FA 99-J and 99-M, [REDACTED]

efs

[REDACTED] Based on my observations during the triennial inspections [REDACTED] it appears certain licensee's are treating circuits of "required" equipment in the same manner as "associated non-safety circuits" Coupled with a "symptom-based" strategy for dealing with mal-operations of equipment "as they occur", only cables whose damage due to fire would cause a complete and total loss of function of required equipment (such as power cables) would typically be provided with fire protection features per III.G.2. In my view, this approach significantly reduces the safety margin achieved through compliance with the regulation as it opens serious questions regarding the operator's ability to detect mal-operations (are all diagnostic instruments / annunciators known to be unaffected by fire damage ?) and mitigate the synergistic effects of multiple mal-operations that may occur. [REDACTED]

efs

-----Original Message-----

From: Russ Bywater [mailto:RLB3@nrc.gov]
Sent: Saturday, August 11, 2001 12:13 PM
To: Sullivan, Kenneth
Subject: Fwd: ANO Appendix R Issues

Ken,
fyi
the fun continues!...

Russ

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