

From: Rebecca Nease, <sup>RTV</sup>  
To: Bywater, Russ  
Date: 3/24/03 4:43PM  
Subject: Re: FYI: ANO Appendix R issue

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I've spoken with Phil Qualls. [REDACTED]

III.G.1 requires one train of SSD systems be free of fire damage.

III.G.2 only applies to those areas where redundant trains of SSD equipment and cables are in the same fire area. In this situation, III.G.2 tells licensees what we mean by free of fire damage (e.g., 3-hr barrier, 1-hr barrier, or 20' separation).

If there are redundant SSD systems in the same fire area that cannot be ensured to be free of fire damage (as defined by III.G.2), the licensee can use the dedicated or alternative method in III.G.3.

[REDACTED]

If, however, one train is entirely in a different fire area than its redundant counterpart, then III.G.2 (or III.G.3) does not apply.

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Why is this so hard?

>>> Russ Bywater 03/24/03 03:26PM >>>

Mike Cooper from ANO licensing pointed out to me today the change to 71111.05, adding Enclosure 2.

He told me that at an NEI/NRR meeting recently, NEI asked why there was no discussion of manual actions with respect to III.G.1 in Enclosure 2. He said that NRR stated that, "You have always been able to implement manual actions associated with III.G.1 compliance, that's why we only addressed III.G.2."

Mike says that this is significant for ANO because their position all along is that the items of our concern are manual actions for III.G.1. He says they do not try to credit manual actions for III.G.2.

On another note, Mike said that their fire protection engineering supervisor [REDACTED]

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CC: Clark, Jeffrey; Smith, Linda; Weaver, Kathy

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