



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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U.S. Nuclear Regulatory Commission  
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Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON PROPOSED RULEMAKING -  
10 CFR PART 50, APPENDIX R, III.G.2 (VOL. 68 FEDERAL REGISTER 69730,  
DATED DECEMBER 15, 2003)

TVA appreciates the opportunity to comment on the subject  
rulemaking published in the *Federal Register (FR)* dated  
November 26, 2003 (68 FR 66501) and titled "Draft Criteria for  
Determining Feasibility of Manual Actions to Achieve Post-Fire  
Safe Shutdown." The comment period was extended to January 26,  
2004 by the subject FR.

TVA's comments are provided in the enclosure.

If you have any questions, please contact Rob Brown at  
(423) 751-7228.

Sincerely,

*Mark J. Burzynski*  
Mark J. Burzynski  
Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

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**ENCLOSURE**

**COMMENTS ON PROPOSED RULEMAKING  
10 CFR PART 50, APPENDIX R, III.G.2 (68 FRN 66501)**

<b>Acceptance Criterion</b>	<b>Comments</b>
General Comment	<p>In several places, the guidance states “. . . do not adversely impact . . .” Additional guidance needs to be provided on what constitutes an adverse impact. Since most licensees only indicated that they could achieve shutdown in 8 hours, if they still achieve shutdown in 8 hours, does that constitute compliance?</p> <p>When evaluating access/egress to or through an area, when is it reasonable to allow an operator to pass through or perform a function in a fire affected area? Guidance used in the past has been 60 minutes, unless a detailed analysis is performed and a deviation submitted. It's not clear where that guidance originated.</p>
Staffing and Training	Provisions should be included to include operators in excess of “on-shift” operators, provided an assessment is performed that ensures there is reasonable assurance that other trained individuals, either on-site or in immediate vicinity could respond. This would only be reasonable for actions later into the Appendix R event.
Special Equipment	The criterion “demonstrated to be effective” does not appear to be applicable to such things as keys, self-contained breathing apparatus, and personnel protective equipment.
Demonstration	The term “same personnel/crews who will be required to perform the actions” should be clarified. The validation should be performed by representatives of the Operations organization that have the equivalent training as persons normally expected to perform the required actions.
Complexity and Number	Additional guidance is needed in this area. The current guidance is based solely on a subjective judgment.
Equipment Pre-Conditions	This criterion could be interpreted to imply that a single failure must be postulated. This is not consistent with current guidance contained in Generic Letter 86-10.