

**STATUS REPORT
SIGNIFICANT REACTOR FIRE PROTECTION PROJECTS**



**Fire Protection Engineering and Special Projects Section
Plant Systems Branch
Division of Systems Safety And Analysis
Office of Nuclear Reactor Regulation**

February 2003

~~PREDECISIONAL INFORMATION - NOT FOR PUBLIC DISCLOSURE~~

Information in this record was deleted
in accordance with the Freedom of Information
Act, 5 U.S.C. 552
FOIA- 2003-358

March 4, 2003

NOTE TO: Gary Holahan, Director, DSSA/NRR
THRU: John Hannon, Chief, SPLB/DSSA/NRR/RA/
FROM: Eric Weiss, Chief, Fire Protection Section, SPLB/DSSA/NRR/RA/
SUBJECT: STATUS OF REACTOR FIRE PROTECTION PROJECTS - FEBRUARY 2003

The attached report provides the status of the significant reactor fire protection projects that are assigned to the Fire Protection Engineering and Special Projects Section. The report does not contain allegation-related material, but may contain predecisional information.

The internal reactor fire protection web page, which provides ready access information for all of our significant reactor fire protection activities, is available at:
<http://nrr10.nrc.gov/adt/dssa/splb/fireprot/index.html>

This status report is issued on a quarterly basis.

Attachment: As stated

CONTACT: Eric Weiss, SPLB/DSSA/NRR
301-415-3264

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22-3

March 4, 2003

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OFFICE	SPLB:DSSA:NRR	SC:SPLB:DSSA	BC:SPLB:DSSA					
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PREDECISIONAL INFORMATION - NOT FOR PUBLIC DISCLOSURE

ISSUE: MANUAL ACTIONS USED TO PERFORM FIRE SAFE SHUTDOWN

DESCRIPTION: On November 14, 2001, during a training seminar for regional fire protection inspectors, the staff addressed manual actions licensees can take credit for in accordance to Appendix R, Section III.G.2, Fire Protection Safe Shutdown. NEI requested a copy of the lesson plan. The lesson plan was subsequently provided in a letter to NEI dated November 29, 2001. On January 11, 2002, NEI sent a letter to the NRC with comments on the training lesson plan. NEI considers that the training lesson plan constituted new NRC guidance. The CRGR reviewed the staff response to the NEI letter for backfit implications on February 26 and on May 6, 2002. No backfit was identified. The staff responded to the NEI letter on May 16, 2002.

CURRENT STATUS: On June 20, 2002, the staff met with NEI to discuss industry concerns related to the use of feasible manual actions in lieu of one of the separation criteria stated in Section III.G.2 of Appendix R. The industry presented the view that many otherwise safe and acceptable manual actions have been adopted by the industry and because of the widespread use of that interpretation, that it would be inadvisable to insist that an exemption, for pre-1979 plants, or staff reviewed deviations for post-1979 plants, be required. The staff expressed its interest in maintaining safety and acknowledged the mutual understanding that all manual actions need to be feasible and effective regardless of any compliance issue. The staff is developing a rulemaking plan for Commission consideration. The rule would provide licensees with the option of performing feasible manual actions in lieu of the current criteria specified in 10 CFR 50, Appendix R, Section III.G.2. The rulemaking plan is now in concurrence.

A related issue is a pending enforcement at ANO-1 concerning a failure to implement Appendix R, Section III.G.2, and the use of manual actions to operate equipment in lieu of passive fire protection. The licensee wrote a letter to the NRC claiming a backfit. The backfit was reviewed by a Region IV backfit panel and the region has sent to the licensee a response letter denying the backfit claim and identifying the failure to implement Section II.G.2. as an apparent violation. The region held a public meeting with the licensee on October 2, 2002, to understand its position on the apparent violation. A Significance Evaluation Review Panel (SERP) was held on January 23, 2003, and the participants concluded that a choice letter with a yellow finding should be issued.

MILESTONES:

- November 14, 2001 Training conducted concerning manual actions
- March 2003 Initial rulemaking package to be provided to Commission

REFERENCES: Letter from NRC to NEI dated 11/29/01, "Fire Protection Training Materials", (ADAMS ML013370302). Included in this letter is an attachment with the lesson plan for the training provided. Letter from NEI to NRC dated 1/11/02, "Use of Manual Actions to Achieve Safe Shutdown for Fire Events" (ADAMS ML020300069). Letter from NRC to NEI dated 05/16/02 (ADAMS ML021410026). Minutes of CRGR meetings of February 26 and May 6, 2002 (ADAMS ML 021750218). Minutes of June 20, 2002, public meeting (ADAMS 021980448). Rulemaking Plan on Fire Protection Manual Actions (ADAMS ML023180628).

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