

ACTION REQUEST 00061781

June 4, 2002

Type : NCR Orig Date: 06/04/02 11:51 Discovery Date: 06/04/02 11:45
Subject : OP-880A MANUAL ACTIONS

Description

FIRE PROTECTION TRIENNIAL ASSESSMENT C-FP-02-01 IDENTIFIED THE FOLLOWING WEAKNESS: "DOCUMENTATION OF REGULATORY APPROVAL FOR MANUAL ACTIONS ESTABLISHED SINCE 1998 IN LIEU OF CIRCUIT PROTECTION OF PHYSICAL SEPARATION REQUIRED BY APPENDIX R SECTION III.G.2 COULD NOT BE LOCATED. AN INTERNAL NRC MANUAL ACTIONS GUIDANCE DOCUMENTED ISSUED ON 11/14/01 INDICATES USE OF MANUAL ACTIONS REQUIRES PRIOR NRC APPROVAL."

ME MANUAL ACTIONS CONTAINED IN OP-880A, "APPENDIX R POST-FIRE SAFE SHUTDOWN INFORMATION," MAY NOT BE IN COMPLIANCE WITH THE CURRENT NRC POSITION REGARDING THE USE OF MANUAL ACTIONS TO SATISFY THE REQUIREMENTS OF 10 CFR 50 APPENDIX R. CR-3 PROVIDED THERMO-LAG (T-L) PROTECTION OF MANY FUNCTIONS FOR OPERATION FROM THE CONTROL ROOM WITH FEW LOCAL (MANUAL) ACTIONS. WHEN T-L WAS DETERMINED TO BE INEFFECTIVE, CR-3 IMPLEMENTED VARIOUS ALTERNATIVES TO REDUCE OUR DEPENDENCE ON T-L, SUCH AS, RE-ROUTING CIRCUITS, REPLACING T-L WITH MECHANICAL FIRE BARRIERS, AND IN SOME CASES, CHOOSING TO PERFORM MORE LOCAL ACTIONS FOR CERTAIN T-L PROTECTED CIRCUITS THAT WERE INSTALLED INITIALLY TO PRESERVE REMOTE (CONTROL ROOM) OPERATION. THIS LAST STRATEGY OF CHOOSING LOCAL (MANUAL) ACTIONS OVER CONTROL ROOM OPERATION COULD BE VIEWED AS EXAMPLES OF THE CURRENT NRC CONCERN REGARDING THE USE OF MANUAL ACTIONS TO ENSURE COMPLIANCE WITH APPENDIX R, SINCE WE ARE CHOOSING TO LET BOTH TRAINS OF CIRCUITS TO BE DAMAGED BY A FIRE. ANY CHANGE IN COMPLIANCE STRATEGY THAT ADOPTED A LOCAL MANUAL ACTION FOR A SAFE SHUTDOWN FUNCTION COULD BE VIEWED AS A VIOLATION UNDER THIS CURRENT NRC GUIDANCE.

Priority : 2 Report To : Status: APPROVED 06/05/02
Due Date : 12/31/02 Event :
Originator : LINDJO Originator Group:
Facility : CR3 Department : 604 Organization:
Owed To : Owed To Group : REGUEVAL
Owed To Fac: CR3 Department : Discipline :

NCR
AR 00061781

Manual
Actions
vs. circuit
protection (III.G.2)
issues requirements

AR
DDD-1

ACTION REQUEST 00061781

Request Attribute	Value	Reqd	Date
1A POT'L OPER/REPORT	N	Y	06/04/02
Name : JOHN	LIND		

Request Attribute	Value	Reqd	Date
2 SUPERVISOR REVIEW		N	
Name :			

Request Attribute	Value	Reqd	Date
2A CR VALID?	Y	Y	06/04/02
Name : SIDNEY	POWELL		

Request Attribute	Value	Reqd	Date
2B FURTHER INVN REQD	Y	Y	06/04/02
Name : SIDNEY	POWELL		

Request Attribute	Value	Reqd	Date
2C RECOMMENDED OWNER		N	
Name :			

Request Attribute	Value	Reqd	Date
2D OPER/REPORT ISSUE	N	Y	06/04/02
Name : SIDNEY	POWELL		

← *operability/
NOT a reportability
concern
based on this
block being N.*

Request Attribute	Value	Reqd	Date
2E MAINT RULE APPLIC	N	Y	06/04/02
Name : SIDNEY	POWELL		

Request Attribute	Value	Reqd	Date
2F SYSTEM	NA	Y	06/04/02
Name : SIDNEY	POWELL		

Request Attribute	Value	Reqd	Date
3 OPERATIONS REVIEW		N	
Name :			

Request Attribute	Value	Reqd	Date
3A IMMED REPT ISSUE		N	
Name :			

Request Attribute	Value	Reqd	Date
3B OCR		N	
Name :			

Request Attribute	Value	Reqd	Date
3B1 OPER ISSUE		N	
Name :			

Request Attribute	Value	Reqd	Date
3B2 REPORT ISSUE		N	
Name :			

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Request Attribute	Value	Reqd	Date
3B3 REW Name :		N	
3C TRACKING NUMBER Name :		N	
4 REG AFF REVIEW Name :		N	
4A OPER/REPORT ISSUE Name : RONALD	N BRIGHT	Y	06/05/02
4A1 OPER ISSUE Name : RONALD	N BRIGHT	Y	06/05/02
4A2 REPORT ISSUE Name : RONALD	N BRIGHT	Y	06/05/02
4B FOLLOWUP ASG REQD Name : RONALD	N BRIGHT	Y	06/05/02
4C T. SPEC VIOLATION Name : RONALD	N BRIGHT	Y	06/05/02
4D ADD'L REPORT REQD Name : RONALD	N BRIGHT	Y	06/05/02
4E PNSC/CIRP REQD Name : RONALD	N BRIGHT	Y	06/05/02
5 CLASSIFN/ASSIGNMNT Name :		N	
5A CR VALID? Name : LOUIS	Y SANTONASTASO	Y	06/05/02
5B FURTHER INVN REQD Name : LOUIS	Y SANTONASTASO	Y	06/05/02

ACTION REQUEST 00061781

Request Attribute 6 MISCELLANEOUS Name :	Value	Reqd N	Date
Request Attribute 6A COMMENTS Name :	Value	Reqd N	Date
Request Attribute 6B COMMENTS Name :	Value	Reqd N	Date
Request Attribute 6C COMMENTS Name :	Value	Reqd N	Date
Request Attribute 6D COMMENTS Name :	Value	Reqd N	Date
Request Attribute 6E COMMENTS Name : WILLIAM	Value C-FP-02-01 NIELSEN	Reqd N	Date 06/05/02
Request Attribute 6F SCHD ISS CLOS DT Name :	Value	Reqd N	Date

ACTION REQUEST APPROVAL REVIEW

Route List: 001	Route List Initiator:LINDJO
Alert	Send Send Action Action
PASSPORT Fac Group/Type Last Name	Date Time Taken Date/Time
POWELS CR3 REGSUPV A POWELL	06/04/02 11:56 APPROVED 06/04/02 12:37
BRIGHR01 CR3 REGREV A BRIGHT	06/04/02 12:37 APPROVED 06/05/02 09:31
SANTOL CR3 UNITEVAL A SANTONASTASO	06/05/02 09:31 APPROVED 06/05/02 10:24

TREND-CAUSE

Facility: CR3	Trend 1: AC	Trend 2: B	Trend 3: B2	Date:
Process: N/A	Org: \$	Rank:	Assign:	
Description: INSUFFICIENT DETAIL OR GUIDANCE IN PROCEDURE/DOCUM				
Facility: CR3	Trend 1: AC	Trend 2: F	Trend 3: F1E	Date:
Process: N/A	Org: N/A	Rank: S	Assign:	
Description: MISINTERPRETATION OR A PROCEDURAL REQ T OR OTHER CO				
Facility: CR3	Trend 1: AC	Trend 2: G	Trend 3: G1	Date:
Process: N/A	Org: \$	Rank:	Assign:	
Description: PROGRAM/ORG DESIGN INSUFFICIENT TO ACCOMPLISH ORIG				
Facility: CR3	Trend 1: EC	Trend 2: ES	Trend 3: ES4	Date:
Process: N/A	Org: N/A	Rank:	Assign:	
Description: PROGRAM COORDINATION				
Facility: CR3	Trend 1: EC	Trend 2: FP	Trend 3: FP	Date:
Process: N/A	Org: N/A	Rank:	Assign:	
Description: FIRE PROTECTION				

ACTION REQUEST 00061781

ASSIGNMENT NUMBER 02 SUB

Type : INVN Due Date : 07/05/02
Status : COMPLETE Reschedule :
Assigned To : J LIND Pri Resp Group: LICSUPV1
Subject : ADVERSE CONDITION INVESTIGATION Sec Resp Group:

Aff Facility: CR3 Unit : System :
UCR : Schedule Ref :
Organization: Department : 604 Discipline :
Est Manhrs : Est Comp Date :

Assignment Attribute Value Reqd Date
1 EVALUATOR/ASSIGNEE N
Name :

Assignment Attribute Value Reqd Date
1A COMMITTED N
Name :

Assignment Attribute Value Reqd Date
1B CHANGE BASIS N
Name :

Assignment Attribute Value Reqd Date
2 MISCELLANEOUS N
Name :

Assignment Attribute Value Reqd Date
2A COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2B COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2C COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2D COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2E COMMENTS N
Name :

COMPLETION NOTES
ADVERSE CONDITION INVESTIGATION COMPLETED 6/20/02. REV
IEWED BY REG UNIT EVALUATOR AND SUPERVISOR, L&RP. READY
FOR APPROVAL.

ASSIGNMENT COMPLETION APPROVAL

ACTION REQUEST 00061781

Route List: 001

Route List Initiator:LINDJO

	Alert			Send	Send	Action	Action
PASSPORT	Fac	Group/Type	Last Name	Date	Time	Taken	Date/Time
POWELS	CR3	LICSUPV1	A POWELL	06/20/02	10:49	APPROVED	06/20/02 14:52
HERRID	CR3	REGUEVAL	A HERRIN	06/20/02	14:52	APPROVED	06/24/02 07:01

ACTION REQUEST 00061781

ASSIGNMENT NUMBER 05 SUB

Type : CORR Due Date : 12/31/02
Status : ACC/ASG Reschedule :
Assigned To : R BRIGHT Pri Resp Group: LICSUPV1
Subject : TRACK NRC APPROVAL OF NEI 00-01 (SEE NOTE) Sec Resp Group:
Aff Facility: CR3 Unit : System :
UCR : Schedule Ref : CR3LIC
Organization: Department : 604 Discipline :
Est Manhrs : Est Comp Date :

Assignment Attribute Value Reqd Date
1 UNIT/SECT EVALUATR N
Name :

Assignment Attribute Value Reqd Date
1A COMMITTED N
Name :

Assignment Attribute Value Reqd Date
1B CHANGE BASIS N
Name :

Assignment Attribute Value Reqd Date
2 MISCELLANEOUS N
Name :

Assignment Attribute Value Reqd Date
2A COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2B COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2C COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2D COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2E COMMENTS N
Name :

Assignment Attribute Value Reqd Date
3A LTCA APPROVAL SEE NOTE N 07/02/02
Name : DENNIS HERRIN ✓

THIS ASSIGNMENT HAS L&RP TRACKING THE STATUS OF THE NRC REVIEW AND APPROVAL OF NEI-00-01. THE ANTICIPATED DUE DATE IS 12/31/02. SINCE COMPLETION OF HIS ASSIGNMENT IS SOLELY RELIANT UPON THE NRC REVIEW AND APPROVAL PROCESS, THIS ASSIGNMENT QUALIFIES FOR LONG-TERM CORRECTIVE ACTION (LTCA) STATUS AS DEFINED IN CAP-NGGC-0200, STEP 3.25. SID POWELL

ACTION REQUEST 00061781

Assignment Attribute	Value	Reqd	Date
3B LTCA CONCURRENCE	SEU CONCURRENCE	N	07/02/02
Name : SARAH	JOHNSON		

COMPLETION NOTES

ASSIGNMENT COMPLETION APPROVAL

Route List: 001

Route List Initiator:

PASSPORT	Fac	Alert	Group/Type	Last Name	Send	Send	Action	Action
					Date	Time	Taken	Date/Time
	CR3	LICSUPV1	A	JOHNSON				
	CR3	REGUEVAL	A	JOHNSON				

ACTION REQUEST 00061781

ASSIGNMENT NUMBER 09 SUB

Type : ENHN Due Date : 12/31/02
Status : COMPLETE Reschedule : Pri Resp Group: ESSSUPV4
Assigned To : J CURHAM Sec Resp Group:
Subject : REVIEW AI-2215 GUIDANCE (SEE NOTE)
Aff Facility: CR3 Unit : System : FS
UCR : Schedule Ref :
Organization: Department : 487 Discipline :
Est Manhrs : Est Comp Date :

Assignment Attribute Value Reqd Date
1 CHANGE BASIS N
Name :

Assignment Attribute Value Reqd Date
2 COMMENTS N
Name :

COMPLETION NOTES
SEE ASSIGNMENT INFO TAB, NOTES SECTION FOR RESPONSE. N
O FURTHER ACTION REQUIRED.

ASSIGNMENT COMPLETION APPROVAL

Route List: 001				Route List Initiator: CURHAJ			
	Alert			Send Date	Send Time	Action Taken	Action Date/Time
PASSPORT	Fac	Group/Type	Last Name	07/01/02	12:40	APPROVED	07/02/02 17:41
MILLEC01	CR3	ESSSUPV4	A MILLER	07/02/02	17:41	APPROVED	07/09/02 12:20
POWELS	CR3	LICSUPV1	A POWELL	07/09/02	12:20	APPROVED	07/09/02 13:03
HERRID	CR3	REGUEVAL	A HERRIN				

ACTION REQUEST 00061781

ASSIGNMENT NUMBER 10 SUB

Type : CORR Due Date : 10/18/02
Status : ACC/ASG Reschedule : Pri Resp Group: OPSSUPT
Assigned To : F DOLA IV Sec Resp Group:
Subject : VALIDATE MANUAL ACTIONS IN OP-880A (SEE NOTE)
Aff Facility: CR3 Unit : System :
UCR : Schedule Ref :
Organization: Department : 965 Discipline :
Est Manhrs : Est Comp Date :

Assignment Attribute Value Reqd Date
1 UNIT/SECT EVALUATR N
Name :

Assignment Attribute Value Reqd Date
1A COMMITTED N
Name :

Assignment Attribute Value Reqd Date
1B CHANGE BASIS N
Name :

Assignment Attribute Value Reqd Date
2 MISCELLANEOUS N
Name :

Assignment Attribute Value Reqd Date
2A COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2B COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2C COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2D COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2E COMMENTS N
Name :

Assignment Attribute Value Reqd Date
3A LTCA APPROVAL N
Name :

ACTION REQUEST 00061781

Assignment Attribute	Value	Reqd	Date
3B LTCA CONCURRENCE		N	
Name :			

COMPLETION NOTES

ASSIGNMENT COMPLETION APPROVAL

Route List: 001				Route List Initiator:				
PASSPORT	Fac	Group/Type	Last Name	Alert	Send Date	Send Time	Action Taken	Action Date/Time
		CR3	OPSSUPT	A				
		CR3	LICSUPV1	A				
		CR3	REGUEVAL	A				

ACTION REQUEST 00061781

ASSIGNMENT NUMBER 11 SUB

Type : CORR Due Date : 10/18/02
Status : NTFY/ASG Reschedule : Pri Resp Group: ESDSUPV3
Assigned To : R CAIRNS Sec Resp Group:
Subject : VALIDATE MANUAL ACTIONS IN OP-880A (SEE NOTE)

Aff Facility: CR3 Unit : System :
UCR : Schedule Ref :
Organization: Department : 477 Discipline :
Est Manhrs : Est Comp Date :

Assignment Attribute Value Reqd Date
1 UNIT/SECT EVALUATR N
Name :

Assignment Attribute Value Reqd Date
1A COMMITTED N
Name :

Assignment Attribute Value Reqd Date
1B CHANGE BASIS N
Name :

Assignment Attribute Value Reqd Date
2 MISCELLANEOUS N
Name :

Assignment Attribute Value Reqd Date
2A COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2B COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2C COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2D COMMENTS N
Name :

Assignment Attribute Value Reqd Date
2E COMMENTS N
Name :

Assignment Attribute Value Reqd Date
3A LTCA APPROVAL N
Name :

ACTION REQUEST 00061781

Assignment Attribute	Value	Reqd	Date
3B LTCA CONCURRENCE		N	
Name :			

COMPLETION NOTES

ASSIGNMENT COMPLETION APPROVAL

Route List: 001

Route List Initiator:

PASSPORT	Fac	Alert	Group/Type	Last Name	Send	Send	Action	Action
					Date	Time	Taken	Date/Time
	CR3	ESDSUPV3	A					
	CR3	LICSUPV1	A					
	CR3	REGUEVAL	A					

ATTACHMENT 7
Sheet 1 of 1
Adverse Condition Investigation Form
Form CAP-NGGC-0200-7-5

Action Request Number: 61781
Facility: CR-3
Unit: N/A

Event Date: 06/05/02
Event Time: 1145
Investigator: John Lind

1. Event Description

Some manual actions contained in OP-880A, "Appendix R Post-Fire Safe Shutdown Information," may not be in compliance with the current NRC position regarding the use of manual actions to satisfy the requirements of 10 CFR 50 Appendix R. (Identified during the NAS triennial Fire Protection Assessment (C-FP-02-01))

The original Appendix R III.G.2 compliance strategy at CR-3 provided Thermo-Lag (T-L) protection of many functions for operation from the control room with few required local (manual) actions (approved through exemptions). When T-L was determined to be ineffective, CR-3 implemented various alternatives to reduce our dependence on TL, such as re-routing circuits, replacing T-L with Mecatiss fire barriers, and in some cases, choosing to perform manual actions for certain T-L protected circuits in lieu of the circuit protection or separation required by Appendix R III.G.2. The addition of these manual actions was accomplished under 10 CFR 50.59, based on CR-3 Operating License Condition 2.(C).9, (ITS Amendment No. 147), which states that "The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely effect the ability to achieve and maintain safe shutdown in the event of a fire." The general industry interpretation of this license condition, which has been adopted by most utilities, is that changes to the fire plan, including the addition of manual actions to satisfy Appendix R III.G.2, do not require prior NRC approval if they meet the above license condition.

The results of Fire Protection Inspections at various utilities, as well as a recent NRC white paper (11/01) and NRC comments (3/02) on NEI 00-01, "Guidance for Post-Fire Safe Shutdown," indicate that the NRC staff's interpretation of the acceptability of manual actions as they relate to the Requirements of Appendix R III.G.2 is significantly different and much more limiting than that of the Industry. As stated in the NRC's comments on NEI 00-01, "Manual operator actions outside the control room to recover hot shutdown/standby systems that have been impacted by the fire is not recognized as an acceptable alternative under III.G.2 of Appendix R."

The NRC and NEI are working to achieve a common, mutually acceptable position on this issue. Progress Energy, at both the individual site and corporate levels needs to track this issue, and develop and implement appropriate corrective actions when this position is formalized through issuance of NEI 00-01 and any related NRC guidance (Regulatory Guide(s), etc.).

A second related issue, although not specifically identified in either the NAS Assessment or the problem description for this NCR, involves the rigor/adequacy of the analyses used to justify the addition of manual actions to OP-880/880A, and the resultant impact of these actions on the overall ability of the operators to perform the procedure as currently written. The Safety Analysis (SA 00-0129) for revision 22 to OP-880 evaluated a significant number of manual actions added to OP-880 in order to resolve various Thermo-Lag issues. In most cases, it appears that emergency lighting and accessibility were considered. However, the SA does not provide

sufficient information to ensure that other factors, such as the complexity of the new manual actions, the number of actions, time available for completion, availability of instrumentation to detect system/component maloperations, feasibility, effects of products of combustion on operator performance, human performance under high stress conditions, available manpower, timing, etc. were evaluated. In addition, the NRC has stated that the implementation of manual actions may increase risk, and that this risk should be considered and compared to the risk of maintaining the system or component free of fire damage. Finally, there is no conclusion regarding the impact of these actions on the overall effectiveness of the Fire Protection Program, as required by CR-3 Operating License Condition 2.(C).9. A review of other SAs written in the 1999 – 2000 time frame related to OP-880/880A and the Fire Study indicate that they also lack most or all of this type of information.

2. Investigation Results (Consider the following)

What happened and how the event/condition occurred:

Changes to Fire Plan documents were being made to restore compliance with the Requirements of Appendix R III.G.2 while resolving the Thermo-Lag issue. These changes included the addition of a number of new manual actions to OP-880/880A. The manual actions were added under 10 CFR 50.59, based on the prevalent industry understanding of the standard license condition related to changes to the fire protection program (CR-3 Operating License Condition 2.(C).9.). Correspondence with the NRC between 1995 and 1998 regarding Thermo-Lag Resolution activities included discussions of manual actions being added. Lack of response or objection by the NRC to these actions was taken as tacit approval, thereby re-enforcing the acceptability of this approach. In addition, fire protection inspections and restart issue inspections during this time period did not identify the addition of manual actions as an issue.

A sequence of events:

1/1993 – License Amendment No. 147 issued – standard license condition 2.(C).9 added to the CR-3 operating License.

10/1995 – Meeting between FPC and the NRC to discuss Thermo-Lag Resolution Strategy

12/1995 – 2/98 Correspondence from FPC to NRC includes discussions of manual actions to address Thermo-Lag issues. No response from NRC indicating this is an unacceptable approach

3/99 - 4/00 - Revisions to Fire Study, OP-880 and generation of supporting 10 CFR 50.59 screenings on going. Manual actions continue to be added to resolve Thermo-Lag issues.

5/02 – NAS Fire Protection Assessment – weakness identified (SA 00-0129, Fire Study Interim Change #1172; OP-880, Revision 22; MP-192, Revision 5)

6/6/02 – NCR 61781 generated.

Specific activities being performed:

Fire Plan and associated document/procedure changes being implemented to support Thermo-Lag Resolution Strategy. 10 CFR 50.59 screenings being written, reviewed and approved to support changes.

Experience level of personnel involved:

The 10 CFR 50.59 screenings reviewed were written by an experienced contractor working for FPC on the Thermo-Lag resolution issue. The reviews and approvals for these screenings were also performed by experienced engineers/engineering supervisors with Appendix R knowledge and experience.

Consequences of the event/condition and any related equipment performance problems:

Unknown pending NRC/Industry resolution of this issue. There are no equipment performance problems associated with this issue.

3. Apparent Cause(s) (Number each cause and reference the number in section 6 below)

1. Lack of detailed/sufficient guidance associated with acceptable methods for implementing/satisfying the requirements of 10 CFR 50 Appendix R. Compounded by 1) a prevalent (and possibly) incorrect industry interpretation of the latitude provided under the standard license condition for fire protection plan changes as it relates to manual actions and Appendix R requirements, 2) the generally positive results of CR-3 Fire Protection and Restart Issue Inspections by the NRC, and 3) the assumption of "tacit" NRC approval regarding the addition of manual actions as part of the CR-3 Thermo-Lag Resolution Strategy. (It is interesting to note that this issue is relatively new compared to Appendix R, indicating a possible change in philosophy on the part of the NRC over the last 4 - 5 years.)
2. Incomplete 10 CFR 59 screenings. Analyses for addition of manual actions did not fully consider the factors associated with the acceptability of the proposed changes in terms of Appendix R requirements (attributable to Cause 1 above). Due to the relatively small number of personnel involved in this issue (the same contractor wrote all of the SAs that were looked at for this investigation), and the general quality and thoroughness of recent screenings written to support fire plan/procedure revisions, this is considered an isolated incident. As such, no corrective action beyond CA #1 is required.
3. Apparent lack of detailed procedure validation. During the period in question, changes to the Fire Study resulted in numerous revisions to both OP-880/880A and AP-990. It does not appear that the cumulative affects of these changes, i.e., the addition of multiple manual actions were validated for OP-880. The guidance provided for changes to the Fire Plan (AI-2215) and changes to OP-880/880A (AI-400C) that existed at the time the Fire Plan/procedure change were made required, at most, a walkthrough by the selected technical reviewers (significantly smaller scope, less thorough than a procedure validation as required for APs and EOPs). Current guidance provided in PRO-NGGC-0202 allows for performance or simulator validations in accordance with AI-400E (EOPs and APs). AI-2215 needs to be evaluated against the guidance in PRO-NGGC-0202 and revised as required.

4. Does this event involve a loss of a Maintenance Rule function? Yes No
 (If yes, contact System Engineer. Contact Maintenance Rule Engineer for assistance if needed.)

5. Do you recommend this event be disseminated as an Operating Experience (OE Program) entry?
 (Refer to CAP-NGGC-0202 Attachment 6 for guidance. If yes, contact the appropriate OE Program Coordinator)

Yes No

The issue of the use of manual actions to achieve compliance with Appendix R is an industry-wide issue that is well know and being tracked by the other Progress Energy Plants (which are all in the similar situation as CR-3) as well as corporate.

6. Corrective Actions

C/A #	Cause #	Planned/Completed Corrective Action	Assignment Type	Assignee or Group	Initial Due Date
1	1	L&RP to track the status of this industry issue. Following resolution, NRC approval and issuance of NEI 00-01 and any associated NRC Guidance documents, appropriate additional corrective actions will be identified and implemented.	CORR	L&RP	12/31/02 (LTCA)
2	3	Operations to determine, with assistance from Engineering, the ability of the operators to perform/ complete the required actions of OP-880A, assuming the worst-case fire damage scenario, minimum staffing, etc. Implement changes to applicable Operations procedures as required.	CORR	Operations	10/18/02

C/A #	Cause #	Planned/Completed Corrective Action	Assignment Type	Assignee or Group	Initial Due Date
3	3	Provide support for Assignment 2 as requested by Operations. Implement changes to the CR-3 Fire Plan and associated procedures/documents as required.	CORR	Engineering	10/18/02
4	3	Review guidance provided in AI-2215 to ensure changes to the Fire Plan (including associated procedures) are reviewed by all affected groups using the appropriate method (level) of validation. Performance or simulator validations should be considered for revised procedures that direct contingency actions for off-normal conditions that are rarely encountered. Revise procedure guidance as required.	ENHN	Engineering	12/31/02

L&RP to track the status of this industry issue. Following resolution, NRC approval and issuance of NEI 00-01 and any associated NRC Guidance documents, appropriate additional corrective actions will be identified and implemented.

Review guidance provided in AI-2215 to ensure changes to the Fire Plan (including associated procedures) are reviewed by all affected groups using the appropriate method (level) of validation. Performance or simulator validations should be considered for revised procedures that direct contingency actions for off-normal conditions that are rarely encountered. Revise procedure guidance as required.

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Assignment 09 Response”

AI-2215 establishes requirements and responsibilities for initiating, controlling, and implementing changes to the to the CR-3 Fire Protection Plan (FPP), and for maintaining it complete and accurate. The FPP does not direct actions or contingency actions for conditions, including off-normal conditions that are rarely encountered.

AI-2215 currently addresses that all changes to the FPP which adversely affect the ability to achieve and maintain safe shutdown in the event of a fire, as determined by the 10 CFR 50.59 review process (REG-NGGC-0010, 10 CFR 50.59 Reviews), or decrease the effectiveness of the program as described in 10 CFR 50.48(a), must be approved by the PNSC per AI-301, Plant Nuclear Safety Committee Charter, and then forwarded to the NRC for approval prior to implementation (refer to License Condition 2.C.(9)). It also addresses that changes evaluated that do not decrease effectiveness or do not adversely affect the ability to achieve or maintain shutdown in the event of fire should proceed with revision, following AI-400C for content and guidance. The decrease of effectiveness review is per Enclosure 1 of AI-2215.

AI-2215 is not meant to control procedures implementing the FP Program. These have been controlled by AI-400 series procedures, and currently fall under newly adopted NGGC procedure PRO-NGGC-0201, “NGG Standard Procedure Writer's Guide” and the review processes set up in PRO-NGGC-0204, “Procedure Review And Approval”. AI-2215 only controls the revision and reviews of the FP Plan itself.

Refer to PRO-NGGC-0204. The intent of a procedure is the specific task or goal that is to be accomplished by that procedure. A change is considered an intent change if it: “Alters or lessens administrative controls necessary to assure safe plant operation such as provided in the Security Plan, Fire Protection Plan, Emergency Plan, Quality Assurance Program, or Environmental Protection Plan. Any change of intent requires full review of those changes in accordance with this procedure.

By definition, a validation review is the process of confirming the actions specified in a procedure can be followed and performed by qualified individuals to achieve the expected results. Performance, Simulator, Walkthrough, Comparison, or Table Top accomplishes validation reviews. A validation review should be performed if any of the following conditions are met:

- The procedure is new.
- The procedure incorporates a new or unproven technique or activity.
- The procedure revision changes the sequence or method of performance or monitoring an activity.
- The sponsor deems necessary based on the proposed changes or type of procedure.

An Impact Review is performed by the affected unit to verify the proposed change adequately interfaces and complies with requirements, processes, and procedures. Impact Review Assignments are identified in attachment 4 of PRO-NGGC-0204, and include both Fire Protection and Appendix R / Safe Shutdown.

A Technical review confirms the written technical and administrative accuracy of the procedure. The objective of this review is to ensure consistency is maintained between the procedure, its source information, and other applicable commitments, administrative policies, and procedures. It also ensures that the procedure can be safely performed as written., by a reviewer appropriately qualified and knowledgeable in the area affected by the procedure.

These reviews are required by PRO-NGGC-0204 (validation as described within the procedure). Thus, the procedure revision process already includes an adequate level of review for changes. All changes to the Fire Protection procedures are reviewed by appropriate affected groups using an appropriate method (level) of validation.

As stated above, AI-2215 is the controlling document for the FPP, and also has a adequate level of review and consideration for changes to FP Program effectiveness.

This action is complete.

Note that the Fire Study actually contains the Safe Shutdown / Appendix R analyses, and it is controlled by NEP-218 (and more recently the newly adopted EGR-NGGC-0102, "Safe Shutdown/Fire Protection Review"). NEP-218 provides the direction for engineering considerations of fire protection related design features including those design features that are required for maintaining compliance with the requirements of 10CFR50 Appendix "R". It relies upon REG-NGGC-0010 for effectiveness considerations.

The purpose of EGR-NGGC-0102 is to provide the review methodology associated with maintenance of the long-term control of the Fire Protection (FP) and Safe Shutdown (SSD) programs. This assures that changes to the plant configurations are reviewed for compliance to the applicable requirements of 10CFR50, Appendix R, NUREG-0800, Section 9.5.1, Branch Technical Position CMEB 9.5-1, Appendix A and Branch Technical Position APCSB 9.5-1, Appendix A and applicable plant commitments. This procedure includes Attachment 1, Safe Shutdown Review Summary Form and Attachment 2, Fire Protection Review Summary Form for program impact assessment.

Operations to determine, with assistance from Engineering, the ability of the operators to perform/ complete the required actions of OP-880A, assuming the worst-case fire damage scenario, minimum staffing, etc. Implement changes to applicable Operations procedures as required.

Provide support for Assignment 10 as requested by Operations. Implement changes to the CR-3 Fire Plan and associated procedures/documents as required.