

SEQUOYAH NUCLEAR PLANT

NUCLEAR TRAINING
TRAINING MATERIALS COVERSHEET

OPERATOR TRAINING - LICENSED
PROGRAM

LICENSED OPERATOR REQUALIFICATION OPL273
COURSE COURSE NO.

APPENDIX R FIRES (AOP-N.01, AOP-N.08, AOP-C.04) OPL273C0202
LESSON TITLE LESSON PLAN NO.

INPO ACCREDITED YES X NO

MULTIPLE SITES AFFECTED YES NO X

PREPARED BY Lacy Pauley	----- Signature / Date
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TVAN CONCURRENCE (if applicable)	----- Signature / Date

Receipt Inspection and Distribution: _____
Training Materials Coordinator / Date

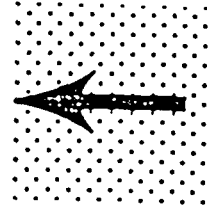
Standardized Training Material
Copies to: _____

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Ary*

5. Regulatory concerns.

- Appendix R DOES NOT offer manual actions as an acceptable alternative to comply with the separation requirement of Section III.G.2 of Appendix R.
- Supplementary guidance to GL-81-12 DOES allow manual actions for associated circuit resolution for Alternative Shutdown.
- During the Appendix R initial review process, NRC approved, via deviation and exemption process, specific manual actions at most utilities on a case by case basis.
- Generic Letter GL-81-12 clarification letter allows manual action in lieu of protecting associated circuits if a licensee can: detect and defeat the spurious action.
- From a safety system engineering perspective, multiple, complex manual actions appear to present a failure probability greater than having redundant safe shutdown trains separated by the Appendix R, III.G.2 criteria.
- Multiple manual actions, in a fire area, can result in being a significant contributor to fire induced core damage failure (CDF).
- Recent inspections have found that some licensee's have taken manual action to the extreme interpretation such no wrap is provided with operators solely relying on responding to mal-operations after they occur in III.G.2 areas.
- This condition is similar to the condition Brown's Ferry was in prior to the 1975 fire.

GL-81-12
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Objective B.3