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**FRAMATOME ANP**  
**FRAMATOME ANP DE&S**

May 29, 2002

Mr. Mark Kanavos  
STP Nuclear Operating Company  
P.O. Box 289  
Wadsworth, TX 77483-0289

**SUBJECT: Recommended Scope and Schedule to Resolve  
NRC Audit Concerns Related to Operator Action Issues  
(Ref. Framatome ANP DE&S B/P No. 00474.01-FP-2002-032)**

Dear Mr. Kanavos:

During the recent NRC Triennial Audit of the South Texas Project (STP), the NRC Fire Protection inspection team identified some concerns with STP's Post-Fire Operator Action List (OAL). Specifically, the inspection team was unable to determine the basis for the times listed in the OAL to assure that STP could safely achieve and maintain safe shutdown of the plant in the event of a fire. In response to this concern, STP agreed to provide the NRC team with a paper trail on a sampling basis that would provide the appropriate design basis information needed to verify actions and times listed in the OAL.

Based on Framatome ANP DE&S' assessment of the NRC's concerns, the OAL and other STP calculations and analyses related to the OAL, the scope, methodology and schedule recommended to accomplish the sampling plan are as follows:

**SCOPE**

The sampling plan shall include a review of post fire operator actions from the OAL (Reference 1) that are associated with the following plant areas:

- Fire Area 01
- Fire Area 02
- Fire Area 03
- Fire Area 07
- Fire Area 31
- Fire Area ALL

Only those actions identified with a FINHOUR less than or equal to 2.00, as well as those actions identified as "spurious actuations" (i.e., FINHOUR = AF, AH, AO or AP) will be reviewed to satisfy the intent of providing the required information on a sampling basis.

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## METHODOLOGY

The major tasks to be completed in support of this work scope are as follows:

### Task 1 – Select OAL Actions for Evaluation

This task involves reviewing the existing Operator Action List (OAL) and selecting the actions that are applicable to Fire Areas 1, 2, 3, 7, 31, and ALL. As identified in the SCOPE section above, those actions that are identified to be completed on or before the 2-hour mark, plus those actions that are due to spurious actuation will be included in the review. In addition, the operator actions will also be compared with existing compliance strategies to ensure that the OAL at a minimum includes all the compliance strategies that rely on manual operations.

### Task 2 – Review Operator Action and Time Bases

This task involves the review of any existing operator action basis referenced from each OAL Item number. Review of the Operator Action Bases Sheet (Reference 3) will include evaluating the required completion time, duration time and the time basis.

This task involves determining if the time basis documented in the operator action bases sheet supports the indicated completion and duration times. This will involve considering the time basis for items included as open items in the Open Item Reports (OIR) from Reference 3. It is not the intent of this review to determine if previously approved engineering calculations are correct, but rather to establish whether existing documentation establishes a firm design basis for the times identified.

For any manual actions identified whereby an acceptable design basis cannot be confirmed, these items will be categorized as to safety significance and the appropriate STP engineer, operation representative, etc. will be contacted to aid in further researching existing calculations.

### Task 3 – Establish Design Basis Reference

This task involves determining the need for the action time commitment, and the documenting of appropriate design basis references or calculations that justify the times indicated.

### Task 4 – Provide Reference to Established Procedures

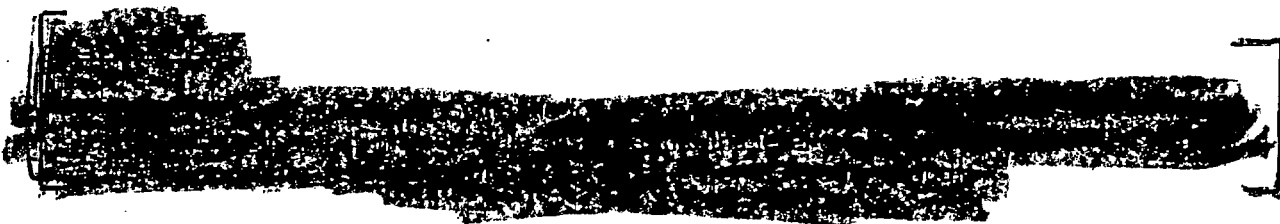
This task involves the search and identification of existing procedures that utilize the operator action under consideration. These procedures will be identified on the OAL.

### Task 5 – Prepare Summary Report

This task involves preparing a summary report describing the results of this effort including any further requirements for additional calculations for justifying the time basis used. Discrepancies uncovered during this effort would also be documented as part of this task. Any safety significant items/issues identified during this work scope will be immediately identified to STP.

Task 6 – Provide Recommendations

Recommendations will be made as part of this effort that may involve suggesting additional instrumentation or other components be added to the SSEL in support of operator actions. Suggestions for enhancing the Appendix R compliance program and database may also be made to capture the results of this effort into a common set of data files.



EX 4

REFERENCES

The following documents were used in the development of this letter:

1. Calculation 5A019MFP001, Report for Post Fire Operator Actions and Equipment Requirements (OAL), Revision 9.
2. South Texas Project Units 1 and 2 Fire Hazards Analysis Report, Amendment 11.
3. Caledonian Technical Report TR-MN-94-001, Operator Action List Bases Document, Revision 0.
4. Calculation 5A011MC6023, South Texas Project Safe Shutdown Compliance Analysis 10CFR50 Appendix R Units 1 and 2, Revision 7.
5. Calculation 7H215MC0001, Feasibility Analysis of Operator Actions in the Event of A Fire, Revision 0.
6. Bechtel Calculation 5A011MC6023, Appendix R Evaluation, Revision 6.
7. Design Change DCN MD-2791.
8. South Texas Project Final Safety Analysis Report (FSAR)

In addition, the following types of additional references will be considered during performance of this work scope, as applicable:

- Operator Procedures
- NRC Generic Letters
- NRC Information Notices
- Other Regulatory Documents

At this time, Framatome ANP DE&S intends to follow-up this letter with a formal proposal to perform this scope of services. We will be working to complete the formal proposal sometime during the week of June 3-7, and we will assume that project work will commence on or about June 10, 2002. The formal proposal will contain a finalized project scope, detailed project schedule, complete project costs and the terms and conditions under which the project will be performed. Should you have any questions regarding these matters, please feel free to contact me at (817) 737-1145.

Sincerely,

Calvin A. Banning  
General Manager  
Fire Protection and Hazards Analysis

Attachment