

December 22, 2004

Dr. Mario V. Bonaca, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: DRAFT PROPOSED RULE ON POST-FIRE OPERATOR MANUAL ACTIONS

Dear Dr. Bonaca:

I am responding to your letter of November 19, 2004, in which you summarized the comments of the Advisory Committee on Reactor Safeguards on the subject of the proposed rule revision to incorporate post-fire operator manual actions into 10 CFR Part 50, Appendix R, Paragraph III.G.2, as a fourth compliance option.

In your letter, you recommended that the proposed rule be published for public comment. You also raised (1) the need to broadly address interactions between operators performing manual actions to respond to an in-plant fire as a result of a security event separately from the consideration for this rule and (2) the potentially unnecessary impact a 12-month periodic requirement for time-authenticated walkdowns of each credited operator manual action may have on those licensees who seek credit for numerous actions.

We agree that physical security overarches many aspects of plant operations and that the security considerations should be addressed in a broader context. The staff is currently evaluating a more global approach to establishing regulatory requirements for safety-security interface. We also agree that the proposed requirement for time-authenticated walkdowns of each credited operator manual action at intervals not to exceed 12 months to demonstrate feasibility and reliability may be excessive for some licensees. A more reasonable level of assurance through demonstration is being considered to ensure that all manual actions are feasible and reliable.

Your continued review and comments on this important subject are appreciated.

Sincerely,

**/RA Ellis W. Merschoff Acting For/**

Luis A. Reyes  
Executive Director  
for Operations

cc: Chairman Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
SECY

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