



Engineering Planning and Management, Inc.

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December 20, 2004

M7001.00

EL0012004-011

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D59
Washington, DC 20555-0001

10/18/04
69FR61419

(4)

Dear Sir or Madam:

On December 8, 2004, Engineering Planning and Management, Inc. (EPM) provided initial comments on the draft of NUREG/CR-6850. Attached please find additional comments.

If you have any questions regarding our comments, please do not hesitate to contact me at 508-875-2121, Ext. 202, or rbk@epm-inc.com.

Very truly yours,

Robert Kalantari
Engineering Services
Division Manager

RBK/tap

Enclosure

SISP Review Complete

Template = ADM-013

E-RDS = ADM-03
ALL = J.S. Hyslop (JS.H2)
M.H. Sallee (MXS2)

NUREG/CR-6850 (Draft)
Comments

December 20, 2004
Additional Comments

In general, Chapter 3 on PRA Cable Selection seems to mix aspects of detailed circuit analysis (in Chapter 9) for selection of cables with simply pulling cables off of drawings based on functional criteria but does not require circuit analysis at this stage. We are not sure how good cable selection can be without circuit analysis; it seems like required cables could be missed without circuit analysis. This needs clarification.

We recommend that the cable selection be performed using circuit analysis and functional criteria as the basis. Also, when adding PRA cables to a master database, we recommend also capturing the cable construction data (or some form of basic cable code). This will provide a line to critical information needed later on (i.e., # conductors, thermoset or thermoplastic, etc.)

In Chapter 9, Section 9.3.2, Assumptions, there is an assumption that Main Control Room actions to mitigate cables failures are not considered to be "manual actions" and are considered feasible. This conflicts with the current regulatory position that Main Control Room actions to mitigate cable failures (i.e., associated circuit failures) are "manual actions", not allowed per Appendix R III.G.2, and are subject to Manual Action Rulemaking.

