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Subject: Proposed talking points for ACRS September 9 brief

I took a crack at it. Pls review and provide additional talking points as appropriate.

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Post-Fire Operator Manual Actions Rulemaking Plan

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Post-Fire Operator Manual Actions Rulemaking Plan Current Status

Commission Released Rulemaking Plan
(SECY-03-0100) to Public on July 2, 2003
Fire Protection Inspection Procedure IP-
71111.05 Issued on March 6, 2003



Background

Questions about compliance to Paragraph III.G.2 of Appendix R to Part 50 arose as a result of recent inspections of licensee fire protection programs

Principal concerns are associated with the use of operator manual actions to provide capability to achieve and maintain hot shutdown

Not all manual actions implemented by licensees have been approved by NRC



Post-Fire Operator Manual Actions Rulemaking Objectives

Permit the use of operator manual actions as an alternative to existing requirements in paragraph III.G.2 of Appendix R to Part 50

Develop generic acceptance criteria for feasible operator manual actions

Use of demonstrated operator manual actions would not require NRC approval if comply with established acceptance criteria



Post-Fire Operator Manual Actions Rulemaking Possible Outcomes

Alternatives:

Manual actions, in combination with fire detection and fixed fire suppression systems, or

Limited set of defined manual actions, in combination with fire detection and fixed fire suppression systems, and existing barriers protection, or

No manual actions allowed



Post-Fire Operator Manual Actions Rulemaking Approach

Key parameters which influence manual action acceptance criteria

- Environment encountered by operators

 - Temperature

 - Fire effects (smoke and toxic gases)

 - Time to damage

- Instrumentation available for detection

- Effectiveness of protective equipment (i.e., SCBA,...)

- Accessibility of all locations where manual actions are required

- Specific procedures identifying the required actions

- Available and accessible special tools required for the action

- Training program to include the use of simulation

- Communication capability



Post-Fire Operator Manual Actions Rulemaking Approach (cont.)

Accomplishment of identified compensatory operator manual actions must be validated

RES review of insights from IPEEE report, Fire Re-Quantification project, and inspection findings related to sample plants

Factors considered in taking credit for manual actions

Potential limits on the feasibility of implementing compensatory manual actions in lieu of plant design features that might otherwise obviate the need for such actions

Ability of operators to perform double duties



Next Steps

Engage public discussion on limitations of operator manual actions

Develop acceptance criteria and associated regulatory guidance

Implement Commission SRM once released

- Exercise enforcement discretion

- Publish Regulatory Issue Summary conveying NRC position and direction

Develop proposed draft rule language