

**Resolution of Manual Actions Issues**

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Advisory Committee on Reactor Safeguards  
Fire Protection Subcommittee  
September 9, 2003




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**Topics**

- Industry view of issue
- Issue resolution needs
- Industry views on feasibility criteria
- Recommendations




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**Industry View of Issue**

- Basic issue: Regulatory treatment of manual actions for redundant shutdown
  - NRC inspection findings
  - NEI survey of industry views and practices
  - Industry - NRC meeting June 20, 2002
  - Actions since this meeting




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FOIA- 2004-377

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### NRC Inspection Findings

- Licensee use of manual actions without NRC approval constituted a violation of Appendix R Section III.G.2



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### NEI Survey Results

- Most licensees use manual actions to some extent for redundant shutdown
  - Some use them extensively
- Licensees interpreted the regulatory guidance as allowing this practice
- Inspection of many licensee safe shutdown programs since the 1980s had not flagged the need for prior approval until the last 2 years



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### Meeting June 20, 2002

- NEI presented the industry views and the results of the survey
- NRC staff agreed that the focus should be on whether the manual actions were feasible
- NRC initiated steps to implement this view



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### **Actions Since the Meeting**

- Informal staff criteria for determining whether manual actions are feasible
- IP 7111.05 revised to include feasibility criteria (March 6, 2003)
- SECY 03-100 recommended rulemaking plan to Commission



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### **Actions Since the Meeting**

- Inspection procedure 7111.05 feasibility criteria
  - Diagnostic instrumentation
  - Environmental considerations
  - Staffing
  - Communications
  - Special tools
  - Training
  - Accessibility
  - Procedures
  - Verification and validation



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### **Actions Since the Meeting**

- SECY 03-100 view:  
*"The staff has concluded that amending Appendix R and associated guidance to allow the use of feasible operator manual actions is a safe and acceptable method for protecting safe shutdown capability from a fire (in lieu of fire barrier separation)."*
- Industry concurs with this position



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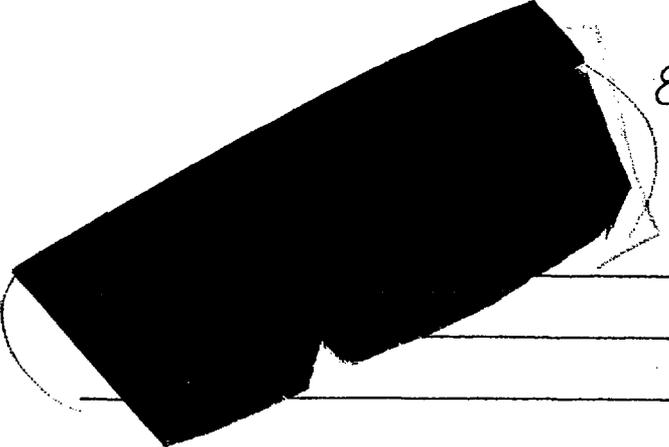
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**Current Issues**

- Gap between NRC intent (SECY 03-100) and current rule language
- Inspections review against current rule
- Green findings are to be issued even when the manual actions are deemed feasible

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**Issue Resolution Needs**

- NRC developing rule to bridge gap between current regulation language and intent
  - Current rule: exemption required to implement manual actions for redundant shutdown
  - SECY 03-100 intent: Focus on feasibility/safety rather than existence of exemption
- This gap creates difficulties for inspectors and plants and results in unnecessary inspection findings

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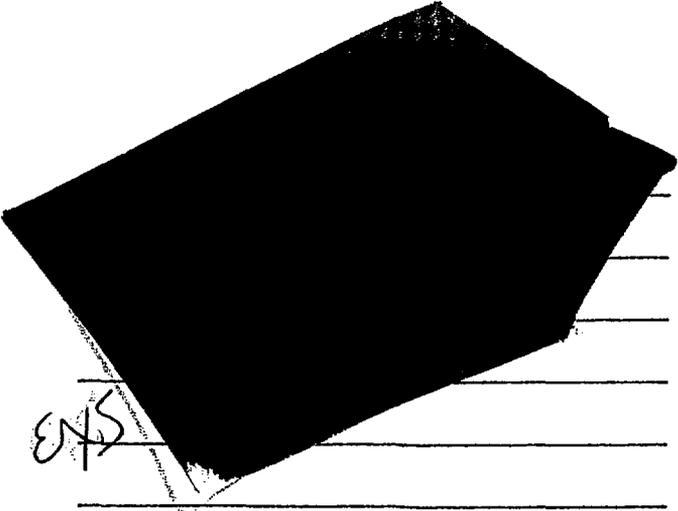
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**Industry Views on Feasibility Criteria**

- Criteria are generally appropriate
- Industry will recommend changes to the IP 71111.05 language

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## Industry Recommendations

- Letter to Commissioners August 18, 2003
  - Implement a direct final rule (speed up rulemaking process) if possible
  - Suspend inspections until new rule finalized
  - Implement enforcement discretion if inspections not postponed
- These recommendations will help address gap between current rule and the NRC intent for a revised rule

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## Summary

- Manual actions safely support plant shutdown if their feasibility is demonstrated
- Recommended steps should be implemented to eliminate inspector or licensee uncertainty about use of manual actions

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