

Resolution of Manual Actions Issues

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Advisory Committee on Reactor Safeguards
Fire Protection Subcommittee
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Topics

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

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

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 5
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

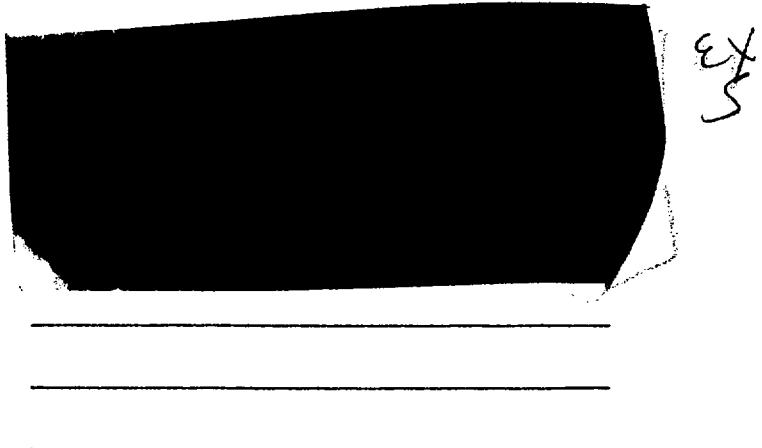
- Most licensees use manual actions to some extent for redundant shutdown
 - Some use them extensively
- Licensees interpreted the regulatory guidance as allowing this practice
- Inspection of many licensee safe shutdown programs since the 1980s had not flagged the need for prior approval until the last 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 71111.05 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 71111.05 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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Ex 5

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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Industry Views on Feasibility Criteria

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

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Ex 5

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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Ex 5

