From: Ray Gallucci
To: Eva Brown
Date: Wed, Jun 2, 2004 3:35 PM
Subject: PRE-D:Thermo-Lag Orders

[redacted]

>>> Paul Gunter <pgunter@nirs.org> 06/02/04 03:26PM >>>
Eva,

Thanks for your email.

I am in receipt of NRC communication of April 23, 2004 re: "Completion Status for the 1998 Thermo-Lag 330-1 Confirmatory Orders."
I have to say it hardly closes out any of our concerns, in fact, it validates them. I also am in receipt of the NRC's May 16, 2004 response to the March 03, 2004 letter from Congressman Ed Markey and Congressman John Dingell which was posted to ADAMS Monday, May 24.

Thank you also for notifying me of the tentative June 23rd public meeting on operator manual actions and 10 CFR 50 Appendix R III.G.2. We are very much interested in attending and participating. I have penciled it in and I will watch NRC public meeting announcement section for confirmation, time and place.

I need to add one significant point in response to your comments regarding the scope of the meeting.

In our view the scope must cover more than just stakeholder comments on detection and suppression systems as they relate to these long standing unapproved manual actions. Central to our fire hazard risk concerns for public safety and security, III.G.2 as you all are aware requires qualified fire-rated barriers and separation between redundant safe shutdown cabling in most cases with the addition of automated detection and suppression systems. If the licensees were to have
maintained three-hour fire barriers according to licensing commitments they would not need smoke detectors and sprinkler systems to be in compliance with fire code under II.G.2. However, they didn't, largely due to "bogus" fire barriers, both three-hour and one-hour, as one Underwriters Laboratory tester referred to Thermo-Lag 330-01. The scope of our comments and concerns therefore extends to NRC's current plan to give up on requiring licensee reliance and compliance in
qualified fire-rated barriers and separation requirements in conjunction with automated detection and suppression. This is our major objection. In our view, this abandonment not only adds significantly to the uncertainty of quantifying the fire risk contribution to core damage frequency (admittedly raising it in a number of cases) but significantly undermines public confidence in the response readiness of nuclear power station security infrastructure.

So to be more precise, the appropriate scope of public comments on the "concepts" relating to operator manual actions needs to deal with III.G.2 in its entiety to include 3-hour fire barriers, one-hour fire barriers in conjunction with detection and suppression or 20-feet of separation with no intervening combustibles in conjunction with automated detection and suppression systems.

Thank you,

Paul Gunter, Director
Reactor Watchdog Project

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Eva Brown wrote:

> Good afternoon.
>
> Mr. Gunter, I am just checking with you to ensure that you have received the NRC's response [ML041120065] to your e-mail to Mr. Weerakkody dated March 1, 2004. It was noted that one of your concerns was included in a letter dated March 3, 2004 from Representatives Dingell and Markey. The response to the March 3, 2004 letter was issued in a letter dated May 16, 2004 [ML041030417] and is attached.
>
> Additionally, I wanted to inform you that the NRC has tentatively scheduled a Category 3 public meeting for June 23rd on fire protection (FP) operator manual actions. The meeting is intended to allow external stakeholders to expand upon their comments regarding the concepts of detection and suppression as it relates to the proposed FP operator manual action rulemaking and the expansion of the operator manual action acceptance criteria to all of 10 CFR 50, Appendix R, III.G.
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> If you have any additional questions or concerns, please feel free to contact me.
>
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CC: Alex Klein; David Diec; Sunil Weerakkody