

From: Kathleen O'Donohue, R2
To: Payne, Charlie
Date: 4/21/04 11:04AM
Subject: Daffy response

Hey - thanks for the info !!!!!

I believe I translated your comments correctly. Would you read the attached and if I missed something or failed to make the point - mark up a hard copy for me.

X-22

(23)

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Recipients

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DCP (Charlie Payne)

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DAFFY Response from RII

1. It is not clear that this revision handles multiple findings in the same fire area. How should these be addressed?
2. Task 1.3.2.1 - how do we determine if barrier provides a 2-hr or greater fire endurance? Is analysis OK? Or do you need testing in the applied configuration?
3. How do we handle the manual actions deficiencies that are to mitigate spurious operations?
4. What if the manual action is considered "skill of the craft" Since there is no procedural guidance for skill of the craft do we give credit?
5. Do fire response / SSD procedures have to be stand alone or can they rely on using Abnormal and Emergency operating procedures (possibly concurrently) to handle Reactor trip and other equipment upsets / malfunctions?
6. Table "Total Unavailability Values for SSD Path....." Discusses 3 categories of HEP's. However, only 2 are described and only 2 values are given. Also, the table should be numbered for ease of reference and identification.
7. Any criteria for acceptable manual actions near or in the fire Area of concern? Some fire Areas are very large and manual actions away from the fire may be feasible. Conversely, some manual actions occur in the room right next to the fire but officially in a separate fire areas. There are doorways that are close enough to the fire that the operator access may be impaired by smoke, fire brigade activities, etc.
8. How are SSD total unavailability values used to determine CCDP? That is: what if the strategy uses aspects of all three? What is to be done; sum them? Multiply? Pick most conservative value? How is this to be treated?
9. For energetic electrical arcing faults, do the breakers in question have to be energized?
10. Pg F-20 and 21 contain tables of pre-solved critical distances for thermoplastic and thermoset cables. The lead in (**bolded**) sentence for the third cable should read as follows: "For a fire near a corner (vice near a wall)."
11. Step 2.7 on pg F-31 discusses guidance in ATT. 10 in several places. As far as we can tell there is no ATT. 10 - we believe these references should be Att. 9.
12. FTD's for smoke detector activation and heat detector activation times are not included on CD
13. Task 2.8.5, Special Cases (pg F-45) discusses findings against post-fire SSD programs which says Phase 2 only applies to a specific fire area. For plant -wide consequences, a Phase 3 should be done. Does this mean skip Phase 2 SDP once the finding is

identified in several fire areas? Also, does this mean we should explore each SSD finding to see if it applies to other FA's which really means should we expand the scope of the inspection to accomplish this?

14. Many typos and grammatical errors. Needs thorough editorial review.
15. Purpose of step 1.4 doesn't make sense. Either there is an error or the step was made much more complicated and difficult for the LIMITED screening benefit this should provide. Should be significantly shortened (we believe this can be accomplished) and simplified.

If you analyze the range of all possible solutions for Task 1.4.3, even under the best circumstances (<3 days; DF = 0.0), only one of the 5 categories will ever screen to GREEN. For findings of moderate degradation in the "Fire Prevention and Administrative Controls" category with a generic fire frequency of E-3, single room findings will screen GREEN. Only 6 of 14 generic fire areas have a frequency in the E-3 range. And if the finding applies plant-wide (as is possible in this category) it will not likely screen GREEN for those 6 areas. All other conditions, degradations, and findings categories will always screen in not out.

This step needs to re-examined and revised.

16. New App F remains very complex. It will take significant training and experience to develop any measurable proficiency to allow routine use. Even then, its complexity will prohibit use on site during the inspection.
17. Many inputs to SDP are not routinely collected during the inspection. Those that are collected are likely to be spread among different team members, each having a piece. A Checklist of information that will be required to successfully process a finding through the SDP should be developed to assist in the collection of the information during the inspection. Each region could do their own, or may even have an unofficial guideline, but it would be better if the checklist was developed with the SDP to ensure nothing was missed and that all 4 regions were working off the same list, for consistency.
18. We need a set phrase to describe the performance deficiency or finding when one Fire Area has multiple issues.—Can we come up with a common, accepted set of words that captures this condition for all four regions to use? (E.g.: failure to properly implement the fire protection program as required by Operating Licensing Condition 3.L)