

~~PREDECISIONAL INFORMATION~~

From: *MMZ* Ray Gallucci *NRK*
To: David Diec; Erasmia Lois; Eva Brown; Phil Qualls; Sunil Weerakkody
Date: 9/10/03 12:52PM
Subject: Re: Validation for Operator Manual Actions Rulemaking

*MMZ
EYS*

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Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 5
FOIA- 2004-277

The criteria suggested in the rule will go a long way towards licensees on their own initiative developing better methods for validation of "feasible" manual actions.]

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✓>>> Erasimia Lois Wednesday, September 10, 2003 9:39:34 AM >>> RES

I think it is very doable; the HRA Risk Insights summary report that I hope I will submit in a couple of weeks includes a discussion on the need to "validate," the assumption made for crediting actions as well as the need to confirm their *reliability* for the various kinds of conditions they may have to be performed.

] MML
4-15

CC: Daniel Frumkin; Mark Salley]

From: Erasmia Lois *RES*
To: David Diec; Hossein Hamzehee; James Bongarra; Phil Qualls; Ray Gallucci; Sunil Weerakkody
Date: Wednesday, September 10, 2003 10:15AM
Subject: Re: Validation for Operator Manual Actions Rulemaking

I am working on it. I am trying to have Sandia to focus to the most important things. (and not everything!). We are not there yet!
Erasmia

>>> David Diec 09/10/03 10:12AM >>> *MD*
Erasmia,

It would be a benefit, if you can quickly summarize and share the HRA risk insights and recommendations with every before you finalize the report (say by next week). This will help every focus and determine the next steps.

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✓ >>> Erasmia Lois 09/10/03 09:39AM >>> *RES*

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✓ >>> Ray Gallucci 09/10/03 08:44AM >>> *MD*

ACRS seemed to have some concern over the validation aspect of the Rulemaking. As Eva and Phil mentioned, the level of Job Performance Drills extends to the SCBA, but does not include simulation of fire effects (smoke, alarms, etc.). I suggested that utilities might enhance these drills to include these effects, either at an offsite training facility (where they could actually include fire), or onsite during outages, etc., when certain fire zones are not critical. Benchmarking HRA against the results of these drills might provide sufficient confidence in the HRA method to permit extending the HRA to include fire effects, abnormal stresses, etc., through the standard measures already in the HRA method.

These "enhanced" fire/op manual action drills could be coordinated, and certified, by someone like INPO for the utilities in general (i.e., INPO conducts the drills using a "generic" fire brigade), or could certify individual utility fire brigades once every X years by having them run through the drills at the INPO facility (or onsite).

Would such a thing be feasible? Practical?

CC: Daniel Frumkin; Eva Brown; Mark Salley