

September 2, 2005

Mr. Alexander Marion
Senior Director, Engineering
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1776 I Street, NW, Suite 400
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SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE REGARDING
NUCLEAR ENERGY INSTITUTE 04-06, GUIDANCE FOR SELF-ASSESSMENT
OF CIRCUIT FAILURE ISSUES

Dear Mr. Marion:

On March 16, 2005, you submitted Revision L of Nuclear Energy Institute (NEI) 04-06, Guidance for Self-Assessment of Circuit Failure Issues (ADAMS Accession No. ML050760219). The staff supports the industry's efforts to standardize the self-evaluations related to circuit failure issues.

The enclosure to this letter provides our specific comments to NEI 04-06. In particular, licensees that perform NEI 04-06 may identify non risk-significant configurations which are not in compliance with their plant licensing basis. Such non-compliances must be resolved in a timely fashion and in accordance with NRC regulations. Also, we would like to reiterate that Regulatory Issue Summary (RIS) 2004-003, Revision 1, does not differentiate between required and associated circuits.

We thank you for your assistance in improving licensees' understanding of the need for circuit failure evaluation. Please contact Dr. Sunil Weerakkody or Mr. Daniel Frumkin of my staff if you have additional questions on this matter.

Sincerely,

/RA/

James E. Lyons, Director
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

Enclosure: As stated

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NRC COMMENTS REGARDING THE NEI 04-06, GUIDANCE FOR SELF-ASSESSMENT FOR
CIRCUIT FAILURE ISSUES

NRC staff comments are provided below.

1. Page 1, fourth paragraph. The guidance in NEI 04-06 does not assess compliance with a plant's licensing basis and applicable rules. Licensing bases are plant specific and must be assessed against plant specific license basis documents.
2. Page 1, fourth paragraph states, "As an example, providing 20' of separation between redundant trains with no intervening combustibles is an acceptable method for compliance" Twenty feet of separation without intervening combustibles also requires detection and automatic suppression.
3. Page 3, first paragraph. Delete "required and associated" since Regulatory Issue Summary (RIS) 2004-03, Rev. 1 does not use these terms. Make this change throughout the document.
4. Page 3, second paragraph, Section 2.2. Note that although the assumption of the consideration of a maximum of two concurrently damaged cables is consistent with RIS 2004-03, Rev. 1, it may not be consistent with a plant's specific licensing basis. The NRC will use the plant's licensing basis for determining compliance.
5. Page 3, Intent of Screening process. The intent must comply with the licensing bases of the facility. Even violations that are "screened to green" or are minor that are identified through this process are violations and must be identified and addressed.
6. Page 5, Section 3.2 paragraph 1. "Identify the . . . that could *significantly* impact." Delete the word "significantly," since limiting identification findings to a judgement of what are significant does not comply with the regulation.
7. Figure A-1 (on page 25) allows screening with 20' separation. It should also mention detection and automatic suppression.
8. Figure A-1 (on page 56) Should not allow screening "low risk" issues without compliance with regulations.
9. Appendix B. This appendix is devoted to "required" and "associated" circuits. The RIS that this document implements does not use these terms. Rather the RIS relates only to failures that could adversely affect safe shutdown, regardless of how they are classified. Therefore, the judgments in this appendix are not consistent with the RIS and should be deleted. Also, based on the technical basis of the appendix, the staff has issues with the determinations (see NRC comments dated 4/27/2004, ADAMS Accession No. ML042270373).
10. Appendix C, Template. This template makes a distinction between required and associated circuits. RIS 2004-03, Rev. 1, does not make this distinction.

ENCLOSURE