

From: "Kalantari, Bob" <RBK@epm-inc.com>
To: <rjw1@nrc.gov>
Date: Mon, Dec 19, 2005 4:42 PM
Subject: Generic Letter 2005-xx

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Attached please EPM's comment on the subject GL, the original copy will be mailed via US mail. Thanks

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Add = A. Markley (AWM)
B. Wolfgang (RSWI)
C. Patel (CPP)

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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

SUBJECT: Comments regarding Proposed Generic Letter 2005-xx; Post-Fire Safe-Shutdown Circuit Analysis Actuations

REFERENCE: Federal Register Notice Vol. 70, No. 201 dated October 19, 2005

Dear Sir or Madam:

Engineering Planning and Management, Inc. (EPM) appreciates the opportunity to provide comments on the proposed Generic Letter associated with post-fire safe shutdown circuit analyses spurious actuation. Following are EPM's comments:

The proposed GL in part states:

The deterministic methodology in NEI 00-01, Rev. 1 (January 2005), "Guidance for Post-Fire Safe Shutdown circuit analysis," chapter 3, for analysis of post-fire safe-shutdown circuits, in conjunction with the guidance provided in this GL, is one acceptable approach to achieving regulatory compliance with post-fire safe shutdown circuit protection requirements for multiple spurious actuations. Licenses should assume that the fire may affect all unprotected cables and equipment within the fire area and address all cables and equipment impacts affecting the required safe shutdown path in the fire area. All potential impacts within the fire area must be addressed".

Section 3.5.1.5(C) of NEI 00-01 states:

"For cases involving the potential damage of more than one multiconductor cable, a maximum of two cables should be assumed to be damaged concurrently. The spurious actuations should be evaluated as previously described. The consideration of more than two cables being damaged (and subsequent spurious actuations) is deferred pending additional research".

These statements are in conflict with each other. It appears that NEI 00-01 is limiting the spurious actuations resulting from only two cables; similar to RIS-2004-003. However, the GL states that fire may impact all unprotected cables. Please provide clarification for this issue.

We hope that you find EPM's comments helpful. If you have any questions, please do not hesitate to contact me at 508-875-2121.

Very truly yours,



Robert Kalantari
Engineering Services
Division Manager

RBK/jns

