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Acting Director  
Nuclear Safety & Licensing

10/19/05

70 FR 60859

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CNRO-2005-00062

December 16, 2005

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

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SUBJECT: Solicitation of Public Comments on Draft Generic Letter Entitled - "Post Fire Safe Shutdown Circuit Analysis Spurious Actuations"

Reference: Federal Register Vol. 70, No. 201 Page 60859 dated October 19, 2005 (Notice of Availability for Public Comment)

Dear Sir or Madam:

Entergy Nuclear Inc. (Entergy) is pleased to submit the following comments on the subject draft generic letter, as requested by the Nuclear Regulatory Commission in the *Federal Register* on October 19, 2005 (70 Fed. Reg. 60859).

1. The NRC appears to be prescribing inconsistent safe shutdown criteria with respect to spurious circuit actuations. What is the technical justification for allowing the "any and all one at a time" interpretation for alternative safe shutdown areas (III.G.3) but not for non-alternative safe shutdown areas (III.G.2)? A fire can not tell if the area is an alternative or non-alternative safe shutdown area.
2. This proposed document, as well as other recent documents on the issue, states that "All plants must review their circuits analysis, assuming possible multiple spurious actuations occurring simultaneously from a fire." The "requirement" as proposed is that you must consider all multiple spurious actuations occurring simultaneously. The complete application of this requirement is recognized by the NRC and industry as not feasible/reasonable; NRC has provided informal guidance (such as consider the worst 2 or 3 simultaneous spurious actuations) to clarify the intent of the requirement. This appears to be inconsistent guidance proposed by the regulator that will be an open and unclear issue for debate during NRC inspections. The generic letter should provide a clear and reasonable requirement.

SISP Review Complete

Template = ADM-013

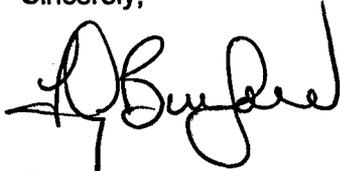
ERIDS = ADM-03

Call = A. Markley (ADM)  
R. Wolfson (RSWI)  
C. Patel (CSP)

3. The proposed generic letter uses the EPRI/NEI test data to support the desired position, yet the test data is incomplete as there are several issues that were "binned" as requiring further research. There is no current research on these issues and as such the industry is subject to another series of new interpretations of existing NRC requirements. The proposed generic letter should be a conclusion to several years of debate between the NRC staff and industry on the circuit analysis issue.

The opportunity to comment on this draft generic letter is appreciated. If there are questions regarding these comments, please do not hesitate to contact me at 601-368-5755.

Sincerely,

A handwritten signature in black ink, appearing to read 'FGB/CEB/ceb', written in a cursive style.

FGB/CEB/ceb