



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

67485-141-148

AUG 10 1984

Docket Nos.: STN 50-482
and STN 50-483

FACILITY: Wolf Creek Generating Station
Callaway Plant, Unit 1

APPLICANT: Kansas Gas and Electric Company

LICENSEE: Union Electric Company

SUBJECT: MINUTES OF AUGUST 10, 1984 MEETING TO DISCUSS THE SNUPPS
SAFE SHUTDOWN ANALYSIS

On August 10, 1984 members of the staff met with representatives from Union Electric Company, Kansas Gas and Electric Company, SNUPPS, and Bechtel to discuss the utilities' safe shutdown analysis. Enclosure 1 is a list of attendees.

The meeting opened with a review of the events which lead to the August 10, 1984 meeting. During an NRC inspection of fire protection at the Wolf Creek Station, the staff identified a concern about the ability of the operators to obtain safe shutdown from outside the control room. In particular, isolation from the control room did not appear adequate. In response to this concern, the utilities noted that the isolation capabilities of the SNUPPS design were reviewed and approved by the NRC staff. This approval was documented in Supplement No. 3 to both the Wolf Creek and Callaway Safety Evaluation Reports. As a result of the inspection, the staff determined that the supplements were in error and that the utilities would need to take corrective actions. Because of this, the utilities requested a meeting.

Next, the utilities discussed their safe shutdown analysis and the fact that there were certain actions which needed to be taken before the auxiliary shutdown panel could be isolated from the control room. Of particular concern to the staff was the problem of not being able to achieve isolation from the control room if a fire had caused a hot short in the safe shutdown circuitry. The NRC position is that transfer switches should isolate the needed safe shutdown equipment regardless of the situation in the control room.

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The utilities rebutted that this was a different set of criteria against which the safe shutdown analysis was reviewed and a different scenario from that which had been previously approved by the staff.

As a result of the above discussion it was apparent that there had been a miscommunication between the staff and the utilities; however, this did not preclude the need to meet the applicable isolation requirements. These requirements are detailed in Enclosure 2. Because SNUPPS did not meet these criteria, the staff concluded that the supplements would need to be revised.

The meeting ended with the utilities noting that this would impact the Callaway full power ascension schedule and the Wolf Creek fuel load schedule. Therefore, a formal request for an appeal would be forwarded.

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Enclosures:
As stated

cc: See next page

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DL:LB
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ENCLOSURE 1

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ENCLOSURE 2

Operability of the hot shutdown systems including the ability to overcome a fire or fire suppressant induced maloperation of hot shutdown equipment and the plant's power distribution system, must exist without repairs. Manual operation of valves, switches and circuit breakers is allowed to operate equipment and isolate systems and is not considered repairs. The removal of fuses for isolation is not permitted. All manual operations must be achievable prior to the fire or fire suppressant induced maloperations reaching an unrecoverable plant condition.

Modifications, e.g., wiring changes, are allowed to systems and/or components not used for hot shutdown, but whose fire or fire suppressant induced maloperation may indirectly affect hot shutdown, i.e., pulling fuses to close PORV that spuriously opened or to prevent spurious opening. These repairs must be achievable prior to the maloperations causing an unrecoverable plant condition.

At the time the fire starts in the control room the capability must exist for hot shutdown outside the control room that is independent of control room circuits. If it can be shown that each piece of equipment necessary for hot shutdown can be isolated from the control room without repairs regardless of control room damage, then this is acceptable. Procedures must exist to perform the isolation. During the time it takes to perform such isolation an unrecoverable plant condition must not be reached, e.g., the plant must be capable of reaching stable hot shutdown condition prior to core damage.

With regards to control room evacuation, the only operation that is allowed prior to leaving the control room is a reactor scram. All other actions required for hot shutdown must be accomplished from outside the control room. Procedures may call for other operations within the control room but also point out the alternative procedure from outside the control room.

Credit is given for coordinated circuit protection features (breaker coordination/fuse coordination) with regards to associated circuits of concern. Associated circuits of concern are defined as those cables (safety related, non-safety related, Class 1E and non-Class 1E) that:

1. Have a physical separation less than that required by Section III.G.2 of Appendix R, and;
2. Have one of the following:
 - a. a common power source with the shutdown equipment (redundant or alternative) and the power source is not electrically protected from the circuit of concern by coordinated breakers, fuses, or similar devices or
 - b. a connection to circuits of equipment whose spurious operation would adversely affect the shutdown capability (e.g., RHR/RCS isolation valves, ADS valves, PORVs, steam generator atmospheric dump valves, instrumentation, steam bypass, etc.) or
 - c. a common enclosure (e.g., raceway, panel, junction) with the shutdown cables (redundant and alternative) and,

- (1) are not electrically protected by circuit breakers, fuses or similar devices, or
- (2) will allow propagation of the fire into the common enclosure.