

**From:** Dan Livermore *DLV*  
**To:** Phil Qualls *MQ*  
**Date:** 11/9/05 12:44PM  
**Subject:** Summary of My Question This Morning

Phil,

Thank you for participating in our training class this morning. Will you please review the Answer below to determine if I summarized your response to my Question appropriately.

Question:

Wolf Creek relies on an Appendix R comparison table included in their USAR as section 9.5, Appendix E. One statement from that table is as follows:

Redundant trains of systems required to achieve and maintain hot standby are separated by 3-hour fire rated barriers, or the equivalent provided by III.G.2, or else a diverse means of providing the safe shutdown capability exists and is unaffected by the fire.

Wolf Creek has interpreted "diverse means" to include feasible operator manual actions necessary to achieve and maintain post fire safe shutdown. Because of their interpretation, not many circuits are protected. That is, they rely on an operator action to accomplish a safe shutdown task. For example, a pressurizer PORV and its associated block valve are located in the same fire area and may spuriously open. The licensee requires an operator to open two DC breakers (located two levels beneath the control room) to shut the PORV. This circuit is not otherwise protected. There are many similar manual actions throughout their fire response procedures.

Are these manual actions acceptable?

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Answer:

The licensing basis has to be examined to determine if manual actions were ever approved.

The statement "diverse means", located only in a comparison document, does not permit the licensee to use manual actions wherever they desire.

If the licensee, without taking unapproved manual actions, cannot maintain one train of systems necessary to achieve and maintain hot shutdown conditions free of fire damage then they are not in compliance.

*B-14*