

4. Protection of RCP seals

Westinghouse in February of 2000 which stated that if seal cooling is not restored in approximately 10-15 minutes, that re-establishing seal cooling after that time could possibly thermally shock the seals and cause an increased RCP seal leakage.

Procedure OFN RP-017, Control Room Evacuation, restores seal injection during Phase B which has a 20 minute limit. Evaluation of when the steps are performed indicated that the seal injection would be restored within 15 minutes.

Limiting the RCP seal leak rate is necessary to maintain reactor inventory control.

During timed walkthroughs of procedure OFN RP-017, Control Room Evacuation, it was determined that it requires approximately 20 minutes to reestablish seal injection once performance of operator response actions for fire damage are included in the timeline. Therefore, the procedure is considered to be inadequate.

Technical Specification 5.4 , Procedures, includes procedures for Fire Protection Program implementation, item 5.4.1.d.



5. Use of manual actions as diverse means

Numerous manual actions are listed in fire response procedure, OFN KC-016. These manual actions are performed to compensate for damage or maloperation of safe shutdown equipment cause by fire.

License Condition 2.C. (5) (a) and SER Section 9.5.1.7, Appendix R Statement, apply.

10 CFR 50 , Appendix R, Section III.G.2 describes three acceptable methods for protecting at least one safe shutdown train when redundant trains are located in the same fire area. The Section III.G.2 requirements are based on the combination of physical barriers, spacial separation, fire detection and automatic suppression systems.

SNUPPS FSAR Appendix 9.5E provided the design comparison between the plant's fire protection program and 10 CFR 50, Appendix R. The comparison to Section II.G, Fire Protection of Safe Shutdown Capability, states:

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

Wolf Creek has interpreted "diverse means" to by any reasonable means including local valve and breaker operations as long as they are within the scope of nromal operator duties.

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