

**SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400/LICENSE NO. NPF-63
FREQUENTLY ASKED QUESTIONS (FAQS), REQUESTING ADDITIONAL
GUIDANCE OR CLARIFICATION REGARDING TRANSITION TO NFPA-805
"PERFORMANCE BASED STANDARD FOR FIRE PROTECTION FOR LIGHT
WATER REACTOR ELECTRIC GENERATING PLANTS"**

NFPA-805 Transition Pilot Plant

FAQ 06-0001

**NFPA-805 Transition Pilot Plant
Frequently Asked Questions
(Template)**

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0001</u>
Submittal Date:	<u>04-25-06</u>	
Licensee Contact:	<u>Jeff Ertman</u>	Tele/email <u>919-546-3681</u>
NRC Contact:	<u></u>	Tele/email <u></u>

Subject

Interpretive Guidance? Yes / No

Proposed New Guidance not currently in NEI 04-02? Yes / No

Details

NEI 04-02 Guidance needing interpretation (include section, paragraph number, and line number as applicable):

Figure B-4 added to NEI 04-02 reflects the concept of III.G.1 (fire affected train) manual actions.

Circumstances requiring guidance interpretation or new guidance:

Clarify approved/unapproved manual actions for change analysis. Add additional discussion on actions associated with redundant trains/fire affected train/alternative shutdown.

Detail contentious points if licensee and NRC have not reached agreement:

NA

Potentially relevant existing FAQ numbers:

NA

Response Section

Proposed Resolution of FAQ and basis for the proposal:

Add new figures (B-4 & B-5) to NEI 04-02 to illustrate fire affected train operator manual actions (where credited train is protected in a fire area, e.g., 3-hour wrap, that includes the fire affected train operator manual action). Configurations shown are functionally equal for the fire affected train of equipment and as such would not require prior regulatory approval for change.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

As follows;

Appendix B-2 - Transition of Nuclear Safety Performance Criteria

The information for operator manual actions that should be included in the summary for the fire area is: 1) whether the operator manual actions were previously reviewed and approved by the NRC's Office of Nuclear Reactor Regulation (NRR), and 2) reference to documentation that demonstrates prior review and approval by the NRC. In some cases the previous approval may not be necessary or may not be obvious, yet should be allowed. Examples are:

- The operator manual action is currently credited in the Alternative Shutdown Procedure. Although this manual action was NOT specifically mentioned in the SER, the licensee submittal specifically discussed the methodology to be used to shutdown. The action(s) is/are feasible and meet the 10 CFR 50 Appendix R, Section III.L (or applicable sections of NUREG-0800) criteria. This can be considered previously approved.
- The operator manual action is currently credited in Non-Alternative Shutdown Procedure. The manual action was specifically discussed as acceptable in the SER however the NRC did not grant an exemption/deviation. This can be considered previously approved.
- The operator manual action is currently credited in Non-Alternative Shutdown Procedure. The manual action was specifically discussed in the Licensee submittal however, it is not mentioned in the SER. This can be considered previously approved.
- Operation of equipment for which cables and equipment for the redundant safe shutdown train are located in separate fire areas thus meeting Section III.G.1 of 10 CFR 50, Appendix R (or applicable sections of NUREG-0800). See Figure B-4.
- Operation of fire affected equipment in fire areas that meet the separation requirements of Section III.G.2 of 10 CFR 50, Appendix R (or applicable sections of NUREG-0800) for redundant trains. See Figure B-5.
- Manual operation of normally operated manual switches and valves where 10 CFR 50, Appendix R, Section III.G.1 (or applicable sections of NUREG-0800) separation is provided for redundant safe-shutdown trains

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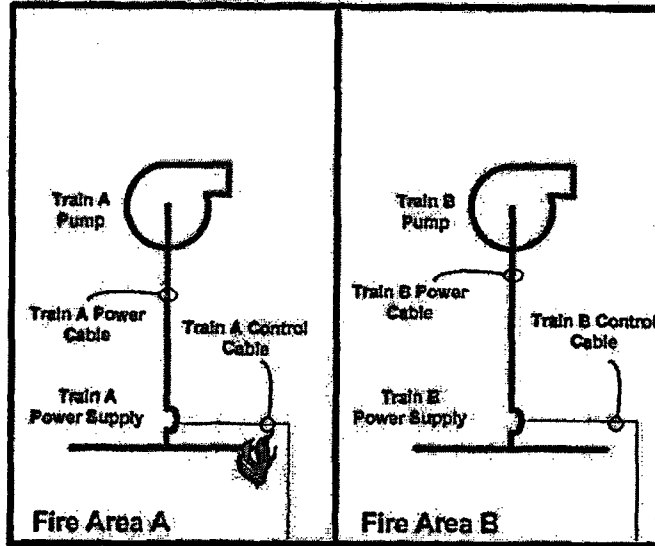
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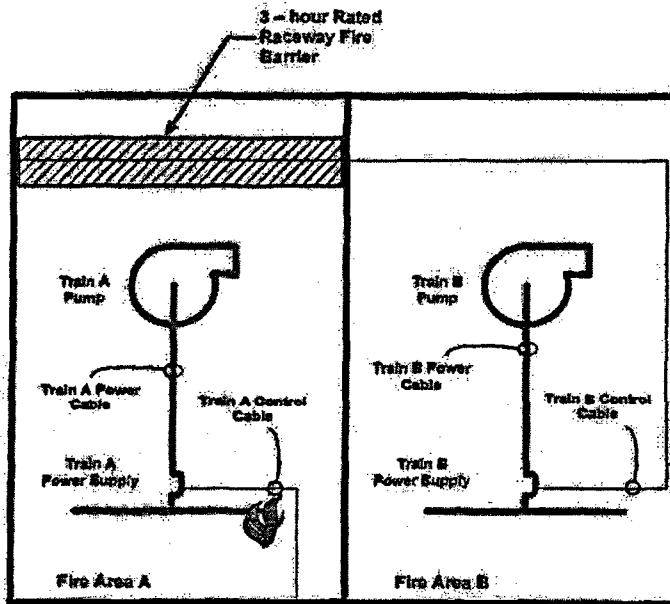
Repairs credited for cold shutdown equipment may also be transitioned on a fire area basis. Information that should be summarized includes reference to documentation that demonstrates the equipment necessary for the repair is staged, the repair is proceduralized, and the repair is achievable in the necessary timeframe.

Operator manual actions that have been previously reviewed and approved by the NRC can be transitioned without the need to use the change evaluation process. However, licensees may consider the use of the change evaluation process for previously reviewed and approved operator manual actions so that the evaluation is consistent with operator manual actions not previously reviewed and approved by the NRC.



Fire Area A and B meet the separation criteria of 10 CFR 50 Appendix R, Section III.G.1. A postulated fire in Fire Area A could result in the spurious starting of the Train A pump, which can be mitigated by a manual operator action to de-energize the Train A Power Supply to stop Pump A.

Figure B-4 Acceptable Manual Action in Fire Area Meeting 10 CFR 50, Appendix R, Section III.G.1 Separation Criteria



Fire Area B meets the separation criteria of 10 CFR 50 Appendix R, Section III.G.2.a. A postulated fire in Fire Area A could result in the spurious starting of the non-credited Train A pump, which can be mitigated by a manual operator action to de-energize the Train A Power Supply to stop Pump A. This is functionally equivalent to Case in Figure B-4.

Figure B-5 Acceptable Manual Action in Fire Area Meeting 10 CFR 50, Appendix R, Section III.G.2 Compliant – Manual Action for Fire Affected Train