

4(b)

From: Joseph Giitter *WMS*
To: Sunil Weerakkody *NRL*
Date: 05/09/2006 4:08:43 PM
Subject: Re: Change made to Appendix C

I'm O.K. with that approach. Through this e-mail I'm informing Les that I concur with going forward with the changes you outlined.

>>> Sunil Weerakkody 05/09/06 3:30 PM >>> *NRL*
Joe:

Here is the proposed revision to our response on Page 5 of 10 of Appendix C to the CRGR Charter. What is in bold is part of the question. Our modified response is below the bold type question. What we added is in RED color. We agree with your comment that all of these paragraphs take the reader through a torturous mental process, arguing both sides of the issue, each paragraph contradicting the previous one. As such we struck out the last two paragraphs. We concluded that for the purpose of this question, we hang our hat on defense-in-depth as the reason for not requiring immediate corrective action..... If you concur with these changes, please send a note to Les at your earliest convenience. *Rel*

(B) an assessment of risk/safety implications of not requiring licensees to immediately restore compliance, and the basis for determination that a reasonable concession could be allowed to defer restoration of compliance at a later time (e.g., next refueling outage).

The EPRI/NEI cable fire tests showed a relatively high probability of multiple spurious actuations occurring simultaneously or in rapid succession during or after a fire. If a licensee did not consider multiple spurious actuations in their post-fire safe-shutdown circuit analysis, it is possible that reasonable assurance cannot be provided that one train of systems necessary to achieve and maintain safe shutdown is free of fire damage. However, the protection of cables from fire damage by separation is one level of the defense-in-depth (DID) concept that is required by 10 CFR 50.48. The other levels (fire detection, fire suppression, administrative controls) are not affected by multiple spurious actuations.

~~A bounding analysis on the potential fire risk in terms of core damage frequency (ADAMS Accession No. ML060830212) indicates that despite some likely conservative assumptions, multiple spurious actuations caused by hot shorts can be risk significant.~~

~~As such, the NRC does not foresee a large number of high risk significant situations that require expedited regulation, especially since licensees are required to take immediate compensatory actions.~~

CC: Les Cupidon

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