Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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71 FR 60200
(1)

January 23, 2007

Rules and Directives Branch
Office of Administration
Attn: Michael Lesar
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001 (MS T-6 D59)

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON DRAFT NUREG 1852, "DEMONSTRATING THE FEASIBILITY AND RELIABILITY OF OPERATOR MANUAL ACTIONS IN RESPONSE TO FIRE" *(71 FR 60200, 71 FR 62323, AND 71 FR 67403)*

This letter provides TVA's comments on draft NUREG 1852, "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire." The initial Federal Register notice was issued on October 12, 2006 (71 FR 60200). Extensions of the due date were given October 24, 2006 (71 FR 62323) and November 21, 2006 (71 FR 67403). The comment period expires on January 30, 2007. The enclosure provides TVA's comments.

TVA appreciates the opportunity to comment on the proposed NUREG 1852. If you have questions regarding our comments, please contact Rob Brown at (423) 751-7228.

Sincerely,

Beth A. Wetzel

Beth A. Wetzel
Manager, Corporate Licensing
and Industry Affairs

Enclosure
cc: See page 2

E-RIDS=ADM-03
Add = E. Lois (FXL1)

SUNSI Review Complete
Template=ADM-013

Enclosure
cc (Enclosure):
U.S. Nuclear Regulatory Commission
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ENCLOSURE

COMMENTS ON DRAFT NUREG 1852, "DEMONSTRATING THE FEASIBILITY AND RELIABILITY OF OPERATOR MANUAL ACTIONS IN RESPONSE TO FIRE"

Applicability	Comments
1. General	Distributed throughout the document are references to conservatisms that could substantially influence the allowed time for operator actions. Examples are: (1) There are recognized differences in how plants utilizing diagnostic procedures and plants utilizing pre-emptive procedures approach Fire Safe Shutdown (FSSD); and (2) There are references that would allow fire modeling to extend time considerations (full automatic detection/suppression and professional fire departments vs. part-time fire brigades; etc.). There should be a summation in the main body that would identify areas in which "special" defense-in-depth considerations, that obviously exceed minimum requirements, are identified and discussed, including credit that might offset imposition of such things as time margins and reliability issues.
2. Appendix A & B	The inclusion of a time margin factor appears to be based solely on FSSD considerations. The defense-in-depth design philosophy utilized in all Fire Protection Programs is based on a three echelon program, of which the FSSD element is only one. Existing regulations (i.e., BTP 9.5.1, NUREG 0800, RG 1.189, etc.) indicate that each echelon should "meet certain minimum requirements." The existing regulations further state that strengthening one "can compensate in some measure for weaknesses, either known or unknown, in others." The methodology for determining an appropriate time margin factor should be further defined to account for the wide variations in existing programs for both the Administrative and the Detection/Suppression echelons of defense-in-depth.
3. Section 3.2.1	Additional guidance should be provided for determining allowable operator action time(s). For example, Appendix R events are postulated to occur when the plant is operating normally at full power. As such, it would seem reasonable to evaluate allowable times based on normal tank levels vs. minimum as done with postulated accidents such as steam line break and loss of coolant accidents. In many instances, this conservatism could alter the allowable time substantially.
4. Section 3.2.2	The imposition of reliability criteria appears to represent an approach which mixes deterministic criteria with risk criteria. In the past, the staff has indicated that plants should not utilize both deterministic and risk elements in a single program. If plants are now allowed to utilize specific risk insights to offset weaknesses in specific elements of a deterministic program, additional examples of areas where this is acceptable should be provided (similar to the guidance in Section 3.2.2 for Reliability associated with manual operator actions). For example, could an area with low ignition frequency, limited in situ combustibles, no major fire hazards, and detection/suppression be considered "low-risk" to the point that separation requirements could be relaxed? If not, what is the basis for applying "risk" criteria to one aspect (i.e., manual operator actions) while excluding it in others.
5. Section 4.2.4	This section should indicate when an area could be considered "accessible" after a fire. In the past, staff reviewers and plants have utilized 1 hour as the guideline. This limitation should be defined or guidance should be provided for the licensee to make a determination.
6. Section 4.2.6	Additional guidance should be provided relative to "adequate communication." For example, for actions occurring after some point into the event, it is not unreasonable to utilize such alternate communication methodologies as runners, provided immediate two-way communications are not necessary.