



NUCLEAR ENERGY INSTITUTE

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February 7, 2007

Mr. Cornelius F. Holden, Jr.
Director, Division of Risk Assessment
Nuclear Regulatory Commission
Mail Stop 10 E1
Washington, DC 20555

SUBJECT: Proposed Industry Methodology for Addressing Post-Fire Safe-Shutdown Circuits
Analysis Spurious Actuations

Project Number: 689

Dear Mr. Holden:

On December 15, 2006, the NRC published Staff Requirements Memorandum (SRM) – SECY-06-0196 Issuance of Generic Letter 2006, "*Post-Fire Safe-Shutdown Circuits Analysis Spurious Actuations*". In this letter, the Commission indicated that the staff should work with stakeholders to develop or endorse guidelines which define a deterministic and risk-informed approach for addressing fire induced multiple spurious actuations.

The industry is developing a methodology to evaluate susceptibility of spurious actuations that affect safe-shutdown that we believe will provide balanced resolution and closure. This methodology would be applicable to all licensees irrespective of whether they have transitioned to 10 CFR 50.48(c) and NFPA 805. Our objective is to incorporate this methodology into a revision of NEI 00-01 and seek NRC endorsement. We are prepared to share the high level details of this methodology at the upcoming public workshop scheduled for February 16, 2007.

One important element developing this methodology is to integrate the results and insights of the CAROLFIRE cable testing program being conducted by the Office of Regulatory Research. Understanding the testing and results will provide much added value to industry's proposed methodology.

As we proceed towards resolution and closure, we recommend NRC staff assure coherence and consistency between current regulatory positions and recently issued generic communications, e.g. RIS 2004-03 and RIS 2005-30.

Mr. Cornelius F. Holden, Jr.

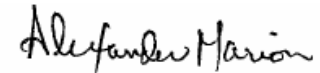
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We look forward to presenting more detail in February and working with you and your staff to bring resolution and closure to this important issue.

If you have any questions, please contact me at 202-739-8080; am@nei.org or Jim Riley at 202-739-8137; jhr@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "Alexander Marion".

Alexander Marion

c: Dr. Sunil D. Weerakkody, Branch Chief, Fire Protection, NRC
NRC Document Control Desk