

Harris NFPA 805 Pilot Procedure Review  
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<b>Procedure</b>	<b>Section</b>	<b>Comment</b>
FPIP-0104	3.1.10	If a component is "Not Required" how do you capture associated non safety circuits by common power supply, common enclosure, and spurious actuation that can adversely affect Appendix R? Is it captured in Section 3.4? Circuits that are associated by spurious actuation include components not directly used to establish a shutdown function but can create a Flow Diversion, or an inadvertent PORV opening, etc which could adversely affect Appendix R.
	3.1.11	High-Low Pressure Interface definition is different than NEI 00-01. This procedure should use the Non NFPA 805 definition.
	3.4	Definition may need to be reworded as "that are not required to effect the safe shutdown" to "that are not required to operate for safe shutdown." Is this definition referring to associated non safety circuits as per Appendix R by common power supply, common enclosure, and spurious actuation which could adversely affect Appendix R?
	4.1	Should there be any responsibilities for manual action in III.G.2 areas and for multiple spurious operations?
	5.0	Are there any PRA and Fire modeling QA?
	6.2	What about multiple spurious operation considerations
	9.1.1	Not all the requirements from III.L are shown. III.G.2/redundant compliance is not given and is different from III.L. Consider updating section.
	9.1.2	Item number 7 should consider multiple spurious operations and pump/valve combinations, and other possible multiple spurious combinations. Item number 7.1 needs a basis for the one inch diameter. Item number 7.2 needs to remove "or power operated relief valves, or" Item number 7.3 are sensing lines included? General - Are Panel/Cabinet wire bundles considered and how?
FPIP-0105	3.0	Make definitions in accordance with RG 1.189 Rev. 1.
	3.2	Multiple spurious operations need to be considered. Instruction given in definition should be removed.
	3.6 & 3.14	Consider intercable and intracable faults. Consider panel/cabinet wire bundles.
	3.13	High-Low pressure interface definition is different than FPIP-0104.
	3.18	Is credited the same as required in FPIP-0104 Section 3.1.10?
	9.2	Are indication circuits considered in the analysis? If not considered why Not?
	9.2.20	Has spurious actuation of RPS, AFAS, etc been considered and where?

	9.2.26	GL 86-10 allows the trip of the reactor from the Control Room during a Control Room evacuation but the trip circuits must be analyzed to show that the trip will be successful. Will you analyze the RX trip circuits during the transition to NFPA 805?
FPIP-0202	Generic	Will you use PRA to add/delete equipment adversely affecting Safe Shutdown when going from Appendix R/NUREG 800 to NFPA 805?