



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001

July 27, 2007

MEMORANDUM TO: George E. Apostolakis, Chairman
Reliability and PRA Subcommittee

FROM: Michael A. Junge, Senior Staff Engineer **/RA/**

SUBJECT: ANALYSIS OF EDO RESPONSE TO ACRS LETTER ON THE
FINAL DRAFT NUREG-1852, "DEMONSTRATING THE
FEASIBILITY AND RELIABILITY OF OPERATOR MANUAL
ACTIONS IN RESPONSE TO FIRE"

Attached is a copy of the EDO's July 23, 2007 letter, responding to ACRS's June 18, 2007 letter to EDO concerning the Final Draft NUREG-1852, "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire." A copy of the Committee's letter is also attached.

Committee Report

In its letter to EDO, the Committee summarized its recommendations and comments on Final Draft NUREG-1852. Following are the Committee's specific comments and recommendations:

- We agree with the staff that operator manual actions should be both feasible and reliable.
- NUREG-1852 should be published as final after revision, as discussed below, and review by the ACRS.
 - The potential use of methods from risk assessments and human reliability analyses can be adopted and should be mentioned in the report.
 - A section in the beginning of the report describing its intended use in context should be added to the report.
 - The report should reflect the characteristics of an Expert Elicitation Panel to provide advice as to the skills of the team that determines the time margin.

EDO Response

The EDO's response, dated July 23, 2007, stated the staff revised the NUREG-1852 to include the following:

- (1) The use of risk assessment and human reliability analysis tools to structure the judgment to be exercised when identifying the range of fire scenarios and related contexts as well as the possible operator manual actions that might be used in response to possible fire scenarios; and
- (2) Indication that the level of analysis and rigor needed to justify that the criteria are met should be commensurate with the complexity of the action proposed to be implemented.
- (3) A summary to describe the combination of skills and expertise that would be appropriate should a licensee choose to use an expert panel to determine time margins for the manual actions proposed for approval

Analysis

The EDO response is satisfactory. The staff submitted the revised NUREG to ACRS on July 3, 2007, and briefed ACRS on the revision during the 544th meeting on July 11, 2007.

Attachments: As Stated

cc w/o attach (via E-mail):

ACRS Members
F. Gillespie
J. Flack
C. Santos
S. Duaiswamy
ACRS Technical Staff