

Staff comment from the telecon:

FAQ 12 concern

During the concurrence process for FAQ 12 it was noted that item 7, absent the drawings referenced in the FAQ, would read such as to make certain OMAs, which are not allowed by current regulations, to be transitioned to NFPA 805. This subset applies to valves which are required to function to maintain hot shutdown.

The drawings referenced in the FAQ refer to the isolation of non-protected train (fire affected train) equipment. III.G.2 of Appendix R states:

*“Except as provided for in paragraph G.3 of this section, where cables or equipment, including associated non-safety circuits that could prevent operation or cause maloperation due to hot shorts, open circuits, or shorts to ground, of redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment, one of the following means of ensuring that one of the redundant trains is free of fire damage shall be provided”*

The FAQ was noted to be inconsistent with the information provided to industry June 9, 2006 public meeting in the response to the EPM questions. Two questions, BWR question 3 and PWR question 1, note that a pre-1979 licensee needs an exemption for flow diversions off of the protected train to ensure that a train of equipment required for safe shutdown remains free of fire damage.

The FAQ, as written, in part 7 would allow bypass flow from the protected train to be isolated by an OMA. If the flow loss is such that isolation is *required* to “achieve and maintain hot shutdown conditions”, then it would need to be protected to meet the requirements of III.G.2. A bypass flow which is not required to be isolated to “achieve and maintain hot shutdown conditions” would not be required to be protected and could be transitioned.