



NUCLEAR ENERGY INSTITUTE

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October 29, 2010

Mr. Alexander R. Klein  
Chief, Fire Protection Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Guidance on Use of Compensatory Measures for Addressing Multiple Spurious Operations

**Project Number: 689**

Dear Mr. Klein:

NEI 00-01, Revision 2, "Guidance for Post-Fire Safe Shutdown Circuit Analysis" was issued in June 2009 for use in addressing fire-induced circuit failures causing multiple spurious actions for those plants not planning a transition to 10CFR50.48(c) - NFPA 805. In November of 2009, the U.S. Nuclear Regulatory Commission issued Revision 2 to Regulatory Guide 1.189 endorsing major portions of the Industry proposed approach and providing some clarifications/adjustments. The NRC also issued Enforcement Guidance Memorandum (EGM-09-002) allowing enforcement discretion for a period up to 30 months from May 2, 2010. To receive enforcement discretion under NRC EGM 09-002 for the resolution of multiple spurious operations (MSOs), compensatory measures had to be implemented prior to May 2, 2010.

The Nuclear Energy Institute Circuit Failure Issues (CFI) Task Force developed the attached industry guidance paper for use in establishing compensatory measures for non-compliances discovered during the resolution process for addressing MSOs. The paper provides the regulatory and technical bases for crediting the use of Operator Rounds as a generic compensatory measure option. As noted in the paper, the selected compensatory measures must be consistent with the licensing bases for the station and the NRC regulations must be evaluated for technical acceptability and effectiveness.

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NEI is providing the NRC a copy of the industry paper for information to assist the NRC's inspection and review of plant efforts to address the multiple spurious operations issue.

If you have any questions regarding this document, please feel free to contact me at 202-739-8108; [jcb@nei.org](mailto:jcb@nei.org) or Thomas Basso at 202-739-8025; [tbb@nei.org](mailto:tbb@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

Attachment