

From: LaVie, Steve
Sent: Monday, February 23, 2015 1:23 PM
To: dly@nei.org
Cc: Lewin, Aron; Robert Kahler (Robert.Kahler@nrc.gov)
Subject: RE: Clarification on Reporting Expectations - Wind Speed and Fire Detection EALs

David

Aron Lewin and I have discussed the questions you raised. See below

From: YOUNG, David
Sent: Wednesday, January 21, 2015 12:17 PM
To: LaVie, Steve (Steve.LaVie@nrc.gov)
Cc: Robert Kahler (Robert.Kahler@nrc.gov); Lewin, Aron (Aron.Lewin@nrc.gov)
Subject: Clarification on Reporting Expectations - Wind Speed and Fire Detection EALs

Steve,

As licensees are working on their revised NEI 13-01 reporting procedures, two more generic implementation questions have been identified . . .

1. Assume that an NRC-approved high-wind speed EAL reads “Wind speed greater than X mph;” however, no instrumentation or parameter value source is specified in the EAL or the Basis. Of course, Operators have instructions in severe weather operating procedures (i.e., not EIPs) for determining wind speed from onsite sources (e.g., a primary tower, a backup tower and/or portable temporary instruments) and offsite sources (e.g., NWS or a local airport), and are trained on the acquisition of the necessary data. Some of these sources can provide data more quickly than others – an installed instrument reading vs. a phone call or use of portable temporary instruments. I believe that a loss of emergency assessment capability report (for the loss of the ability to assess the wind speed EAL) would be required if **all** the procedurally-driven sources for wind speed were unavailable. Would this be a reasonable approach for licensees in this situation to follow?

We agree. If the licensee’s approved EAL threshold language and bases DO NOT identify the instrument displaying the wind speed expressed in the EAL, then whatever procedurally defined source for the wind speed value could be used to declare the EAL. As long as there was an available source for the wind speed value, then the assessment capability is not LOST. However, this response is contingent on the EAL identifying the threshold wind speed value without specifying the instrument(s) displaying the wind speed. If a single specific wind speed instrument is identified, then that instrument would be the basis for determining reportability for an unplanned loss; all of the other possible sources might fall into the compensatory action category for a planned outage.

Engineering judgment comes into play when assessing the various sources of the wind speed value. An inspector might not find a wind speed source 500 miles away from the site to be representative of the conditions at the site. I note that dose assessment also uses wind speed as a significant input.

2. between the failure and the establishment of a fire watch, but the necessary actions are controlled by a fire protection program procedure. Would a loss of emergency assessment capability report (for the loss of remote fire detection in the given area) be required in this case? The failure/malfunction of a fire detector is not an infrequent event and, given the planned programmatic actions to address it, I'm unsure if this event warrants a report.

Given the information provided, we do not believe it would be reportable under § 50.72(b)(3)(xiii). Since Revision 4 of NEI 99-01, the NOUE fire EAL has identified an EAL of "FIRE not extinguished with 15 minutes of control room notification or verification of control room fire alarm..." or words to that effect. So there are two parameter sources here: (1) a fire alarm or (2) receipt of a notification. In keeping with the general guidance, both must be lost to warrant a report, i.e., loss of ALL procedurally driven sources. An outage of the fire alarm would not be reportable if the notifications threshold is still available. (Note that we are talking EALs here, I can't say whether the fire plan may have an issue.)

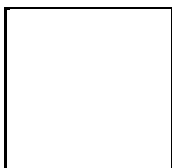
Although a dedicated fire watch may be driven by the fire plan as a contingency action, a fire watch isn't the only source of notification. The site-specific access training at every plant I have been at requires all plant employees to report conditions such as this to the control room via phone or page-party. The NRC staff approved this EAL knowing that not all areas of the plant are monitored by fire alarms and that for many areas, observation by plant workers is the only indication of a fire in those areas.

We are talking reportability for both of these scenarios. The licensee needs to keep in mind its obligation under §50.54(q)(2) to maintain the effectiveness of its plan. The inspectors will be particularly interested in any long term outages

[In Revision 4 & 5, Alert HA2 has identified "FIRE of EXPLOSION resulting in VISIBLE DAMAGE to any of the following structures containing safety systems or components OR control room indication of degraded performance of those safety systems..." There isn't a specific reference to a fire alarm and the control room indications referred to are the instruments that monitor the performance of those safety systems. Hence, this EAL is not affected by an outage of fire alarms.]

Any insights on these would be appreciated.

David



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