

NEI EP FAQ 2015-001

Question, including background description and applicable reference(s):

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.

Operators have instructions in severe weather operating procedures (i.e., not EPIPs) 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. NEI believes 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?

Proposed Solution:

If the licensee's approved EAL threshold and bases DO NOT identify the instrument displaying the wind speed expressed in the EAL, then whatever procedurally defined source(s) 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. Again, this response is contingent upon the EAL that identifies the threshold wind speed value, and its basis, NOT specifying the instrument(s) used to obtain the wind speed. If a single specific wind speed instrument is identified, then that instrument would be the basis for determining if reportable condition exists. All of the other possible data sources might fall into the compensatory action category.

Engineering judgment may come into play when assessing the various sources of the wind speed value. For example, a remote/offsite wind speed source must be representative of the conditions at the site.

NEI EP FAQ 2015-002

Question, including background description and applicable reference(s):

Assume that a fire detector in an area containing safety system equipment fails. In accordance with their Fire Protection Program requirements, a plant would establish a fire watch for the area. There would be a short period of time 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, the industry is unclear if this type of an event warrants a report.

Proposed Solution:

Given the information provided, the NRC staff does not believe that this event would be reportable under § 50.72(b)(3)(xiii) provided that the licensee's fire-related EALs address fire notifications by plant personnel. In the last 3 revisions of NEI 99-01, this provision is addressed by:

- Revision 4 – "FIRE in buildings or areas contiguous to any of the following (site-specific) areas not extinguished within 15 minutes of control room notification or verification of a control room alarm:"
- Revision 5 – "FIRE in buildings or areas contiguous to any of the following (site-specific) areas not extinguished within 15 minutes of control room notification or verification of a control room alarm:"
- Revision 6 – "Report from the field (i.e., visual observation)"

None of these EALs contain a reference to a specific fire alarm; therefore, they are not affected by a fire alarm outage. Further, there are two parameter sources here: (1) a fire alarm and (2) a receipt of a notification. In keeping with the general guidance, both must be lost to warrant an event report, i.e., a loss of ALL procedurally driven sources. An outage of a fire alarm would not be reportable as the notifications threshold is still available. Although a dedicated fire watch may be driven by the fire protection plan as a contingency action, a fire watch isn't the only source of notification. As is typically covered in site-specific access training, all plant employees are required

to promptly report emergency conditions such as fires to the control room. The NRC staff approved site-specific EALs knowing that not all areas of the plant are monitored by fire alarms; for these areas, observation by plant workers is the sole indication of a fire.

The licensee needs to also keep in mind the requirements of §50.54(q)(2). The NRC resident inspectors will be interested in the status of any long-term fire detection outages.