



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 27, 2016

MEMORANDUM TO: Robert C. Daley, Chief  
Engineering Branch 3  
Division of Reactor Safety  
Region III

Irfan A. Khan  
Engineering Branch 3  
Division of Reactor Safety  
Region III

FROM: Thomas H. Boyce, Chief */RA/*  
Regulatory Guidance and Generic Issues Branch  
Division of Engineering  
Office of Nuclear Regulatory Research

SUBJECT: ACCEPTANCE REVIEW OF PROPOSED GENERIC ISSUE ON  
SECONDARY SHORT CIRCUIT PROTECTION FOR  
CONTAINMENT PENETRATIONS

The Generic Issues Program staff has received your proposed generic issue relating to an unresolved item (URI) noted in a 2014 Component Design Basis Inspection (CDBI) finding at Palisades nuclear plant, regarding secondary short circuit protection for containment penetrations, which was recently submitted through the Nuclear Regulatory Commission's (NRC) Generic Issue website. Your document has been entered into the Agencywide Document Access Management System (ADAMS) as ML16245A254.

Management Directive (MD) 6.4, "Generic Issues Program" provides criteria for determining those issues which should be dispositioned within the Generic Issues Program. The guidance of MD 6.4 indicates that a proposed generic issue should not be accepted into the generic issue process if it fails to meet any of the seven criteria below.

1. The issue affects public health and safety, the common defense and security, or the environment.
2. The issue applies to two or more facilities and/or licensees/certificate holders, or holders of other regulatory approvals.
3. The issue is not being addressed using other regulatory programs and processes; existing regulations, policies, or guidance.
4. The issue can be resolved by new or revised regulation, policy, or guidance.
5. The issue's risk or safety significance can be adequately determined in a timely manner (i.e., it does not involve phenomena or other uncertainties that would require long-term study and/or experimental research to establish the risk or safety significance).

CONTACT: Stanley Gardocki, RES/DE/RGGIB  
301-415-106

6. The issue is well-defined, discrete, and technical.
7. Resolution of the issue may involve review, analysis, or action by the affected licensees, certificate holders, or holders of other regulatory approvals.

Our acceptance review indicates that the issue fails to meet criterion #3, "The issue cannot be readily addressed through other regulatory programs and processes; existing regulations, policies, or guidance; or voluntary industry initiatives." The generic issue staff finds that this proposed issue is currently being addressed within the agency's inspection process as a URI. Specifically, the NRC's regional staff is working with the headquarters staff to resolve this issue at Palisades, as well as other plants, as part of the resolution to the URI. As you know, this issue was considered as part of the Systematic Evaluation Program (SEP) initiated by the NRC in 1977 to review the designs of 51 older operating nuclear power plants that were licensed prior to issuance of the General Design Criteria in Appendix A to Title 10 of the Code of Federal Regulations, Part 50. We understand that the staff is organizing a working group to create a process to resolve plant-specific licensing issues that originated from the SEP program. The staff's current efforts are anticipated to encompass this proposed generic issue. Therefore, this proposed issue will not be accepted into the GI process at this time.

Nonetheless, we'd like to thank you for submitting this proposed issue into the generic issue program for consideration. If the current staff's efforts do not fully resolve this proposed issue, please consider resubmitting the issue back into the generic issue process. Please contact the point of contact listed on this memorandum should you have any questions.

- 6. The issue is well-defined, discrete, and technical.
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OFFICE	RES/DE/RGGIB	RES/DE/RGGIB
NAME	S. Gardocki	T. Boyce
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