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MEMORANDUM FOR: Charles E. Rossi, Director
Division of Operational Events Assessment, NRR

FROM: Christopher I. Grimes, Chief
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SUBJECT: SUMMARY OF OWNERS GROUPS MEETINGS ON THE NEW STANDARD
TECHNICAL SPECIFICATIONS: MARCH 18 & 19, 1992

On March 18, 1992, the Technical Specifications Branch met with the Owners Groups, and on March 19, 1992, the Owners Groups Executives met with NRR senior management to discuss the status of activities for resolving comments on the draft standard technical specifications (STS) and related matters. The meeting attendees are listed in Enclosures 1 and 2, respectively.

There was no formal agenda for the staff's meeting with the Owners Groups on March 18, 1992; the purpose of the meeting was to discuss the status of the schedule, action assignments, and the Executive agenda. The Owners presented an updated activity schedule (Enclosure 3).

Bob Tjader indicated that the staff had proposed a note to be added for the control rod movability surveillance requirement to clarify operability considerations (movability as an indicator of "trippability") for the surveillance and the application of SR 3.0.1 to trippability, as described in the condition for the control rod LCO. NRR management previously concluded during the meeting on February 5, 1992, that trippability is the attribute of importance for the control rod safety function. However, the application of this concept appeared to conflict with SR 3.0.1, which states:

"Failure to meet a Surveillance, whether such failure is experienced during performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO."

The Owners Groups concluded that there was no need for any clarification. The Owners contend that the relationship between operability and trippability will be adequately explained in the Bases for Section 3.1 of the STS, to the extent that there is no need to change OPERABLE in the body of the limiting condition to read "trippable." Further, the Owners indicated that, in the event that a control rod is immovable at the time the surveillance is due, the failure would have to be corrected so that the surveillance (movement) could be performed within the 25% allowance for the surveillance interval.

The Owners Groups' explanation of operability considerations for control rods caused a tumultuous response from the staff. Particularly, the staff expressed concern that the control rods are not particularly different than other safety systems that may have non-safety functions or capabilities that also must be considered relative to "operability" of particular systems. The

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staff also expressed concern that the Owners Groups' rationalization of the need to restore the "non-safety" function in order to perform the surveillance fundamentally violates long-standing principles and interpretations applied to operability and surveillances for technical specifications. The staff also expressed concern over the precedent that this particular position would have on the recently issued guidance on degraded conditions and operability, and potential future ramifications for more extensive divisions between safety and non-safety functions.

During the discussion that ensued, the staff and Owners discussed a variety of implications and analogies to characterize the relationships between operability and safety function, and between surveillance results and operability determinations to grapple with this issue. These protracted discussions primarily involved different views regarding language meaning and consistency and did not appear to disclose any new insights into the safety functions of control rods. Consequently, I concluded that the staff's concerns involved language preferences, irrespective of the potential for misuse or abuse of this position as a demonstration of the relationship between operability and safety function with respect to broader technical specification policies. On this basis, I concluded that OTSB will defer to the Owners Groups choice of language for control rod operability and Bases, provided that their proposed language is technically accurate.

The B&W Owners indicated that, although the generic concerns regarding pressure isolation valves (PIVs) had been addressed during the meeting on March 16, 1992, there are unique design considerations for B&W plants which make the resolution of the PIV issues untenable for them. I requested that the B&W Owners submit a written appeal to ensure that staff can focus its limited resources in this area to the B&W-specific concerns.

Chris Hoxie indicated that an action item for Section 1.0 concerning the definition of pressure boundary LEAKAGE had been overlooked. The Owners had agreed to develop a clarification for the Bases to resolve the issue raised in Section 1.0. While the clarification effects several sections, the Owner's had proposed to incorporate the additional Bases material in Section 3.4 for the Reactor Coolant System. Mr. Hoxie will coordinate with Ms. Weston to incorporate an appropriate clarification.

Carl Schulten similarly indicated that a new issue evolved from the resolution of issues for Section 3.3; the issue involves consistency in the manner by which the potential for positive reactivity changes are treated in the Applicability provisions for Sections 3.3, 3.4 and 3.7. The Owners agreed to evaluate the concern and develop a means to achieve consistency between the three sections that would allow appropriate latitude for normal maneuvers, with appropriate constraints for Applicability considerations.

Mag Weston indicated that the BWR Owners had submitted proposed changes for Section 3.9.6 (Enclosure 4) which had been previously rejected because of a lack of technical basis to incorporate the changes. The BWR Owners indicated that they believe that the proposed changes, which would distinguish the limitations on handling irradiated fuel from those for new fuel or control rods. I indicated that (1) the proof and review version of Section 3.9 had

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just been issued, and I did not believe that this issue warranted pulling the section back for such a change, and (2) I had previously concluded that additional technical support would be necessary to clarify the appropriate constraints. Consequently, I concluded that, if technical resources are available, OTSB would arrange for a technical clarification of this issue and incorporate any acceptable changes into the June issuance of the completed STS for proof and review.

I also noted that, in a meeting on February 24, 1992, the SICB staff had informed the Owners Groups that all of the open issues related to B&W's topical report on "indefinite channel bypass" had been resolved; however, before OTSB could incorporate conforming changes to Section 3.3, we needed to have the staff's safety evaluation report (SER) to clearly understand the extent of the changes and provide the technical justification for the changes. However, because of resource constraints, OTSB had committed to assist SICB in the preparation of the SER, which would detract from the time available for us to resolve all of the other changes to the STS. Accordingly, I concluded that the changes to incorporate "indefinite channel bypass" for both CE and B&W plants would have to be deferred to preclude broader impacts on the comment resolution schedule. OTSB will incorporate these changes at the earliest possible time after the SER has been approved, hopefully before June 1992.

The resulting updated list of STS action items is included as Enclosure 5.

The Executive meeting was held on March 19, 1992; the meeting agenda is presented in Enclosure 6. I described the status of the schedule (Enclosure 7) and the Executive's priority issues (Enclosure 8). I indicated that Section 3.9 had been issued on March 16, 1992, and there continues to be agonizing but steady progress. I also indicated that the staff has only had limited experience with the complete edit cycle, but I believed that process improvements would continue as they had with the editorial panel reviews.

All of the Executive Priority Issues have been resolved, except for the four items that are outside the scope of the comment resolution process (Enclosure 8). I described the resource/priority issue associated with the topical report review, described above, and committed to address the issue at the earliest possible time our resources permit; nevertheless, this issue can still be resolved during implementation, as well. I noted that a similar resource/priority constraint has delayed the preparation of a line-item improvement for diesel testing requirements. OTSB needs to resolve the testing issues in Section 3.8 to provide the model specifications that would accompany the generic action. Subsequently, we would present the proposed action to the CRGR, and their schedules have been delayed by the President's request for a regulatory review.

The appeal on the staff's position for alternate/dedicated and remote shutdown equipment was presented to NRR management and the Executives, as summarized in Enclosure 9. The staff's and Owners Groups' written positions on this issue had previously been distributed, and are included as Enclosure 10 for completeness. I summarized the staff's position along the following points:

- It was the staff's intent in Generic Letter 88-12, to implement the

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Commissions' interim policy on technical specification improvements in such a way as to retain the equipment relied upon for post-fire safe plant shutdown in the limiting conditions for operation (as defined by Generic Letter 81-12), even though these generic requirements have not been implemented consistently.

- The inclusion of this equipment in the technical specifications is consistent with "Criterion 4" of the policy (risk significance), because fires inside or outside the control room can be a significant contributor to core damage frequency, and this equipment is necessary to ensure safe shutdown capability.

The Owners Groups position was summarized as follows:

- Although the need for these safe shutdown capabilities in the plant design is clear, these features are an integral part of a larger program for fire protection, and are not otherwise required to be in technical specifications according to the applicable regulations (GDC 19 or Appendix R).
- Some of these safe shutdown capabilities can be important to risk, but that depends on widely varying plant-specific vulnerabilities. Not all of the safe shutdown capabilities are primary success paths to mitigate dominant accident sequences. The extent of importance to risk will be established as part of IPEEE.
- Only four plants have technical specifications for the full complement of post-fire safe shutdown equipment. All of the other plants have maintained the safe shutdown equipment (except for the Remote Shutdown Panel) as part of their Fire Protection Program; the NRC has inspected these programs and found them acceptable.
- The full complement of post-fire safe shutdown equipment is extensive; listings of the equipment can range from 30 to 50 pages. Such a scope of equipment would be cumbersome in the technical specifications.

The Owners Executives indicated that the administrative controls for the Fire Protection Program in Section 5.0 of the new STS could be expanded to more clearly address the equipment for the post-fire dedicated, alternate, and remote shutdown capabilities. Further, the Owners Executives indicated that it was not their intention to remove the limiting conditions for the remote shutdown panel. However, all of the other post-fire safe shutdown equipment has been adequately maintained under these programs and, therefore, the Owners Groups do not believe that broader Technical Specification controls are necessary.

Mr. Russell concluded that, if only four plants have the full complement of post-fire safe shutdown equipment in the technical specifications, then it would be inappropriate to attempt to incorporate broader requirements into the new STS, beyond the remote shutdown capability. However, Mr. Russell also indicated that the staff should pursue this matter as a potential backfit, if necessary, to resolve the consistency of control for post-fire safe shutdown

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equipment. He noted that additional requirements for hot shutdown capability will likely evolve from the Shutdown Risk Study because of the particular significance of fire as dominant contributors to shutdown risks. Consequently, in the long term, additional limiting conditions may have to be imposed for all plants to ensure adequate safe shutdown capability for fire events.

The Executives indicated that the next meeting should address measures of effectiveness and implementation issues, because those issues were raised by the Commission. In particular, the Executives requested that we resolve the need for renoticing of the license amendments for STS conversions. Dr. Murley indicated that whether or not hearings will be required, before or after conversion to the new STS, will depend on the quality of the significant hazards considerations, and the extent to which the utilities application tries to accumulate changes beyond the scope of the STS conversion. I suggested that founding the STS through rulemaking be considered as one of the alternative approaches. Dr. Murley and Mr. Russell encouraged the staff and Owners Groups to be open-minded and innovative, and requested that the staff and Owners Groups develop a generic conversion process that could serve as a framework for the evolution of more detailed practices.

The next Executive meeting is scheduled for April 23, 1992.



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Enclosures:
As stated

cc: T. Murley
W. Russell
L. Bush, OG
→ W. Hall, NUMARC
R. Tworek, MEREX

SUMMARY

Staff Position: The NRC Staff has concluded that the Standard Technical Specifications (STS) should include alternate/dedicated shutdown equipment provided for the design to comply with the requirements of Appendix R and remote shutdown capability of GDC 19. "...fires (either inside or outside the control room) can be a significant contributor to the core melt frequency...the [remote shutdown] instrumentation meets the Policy Statement Criteria, based on risk."

Industry Position: *The NRC Staff's position that the Standard Technical Specifications (STS) should include alternate/dedicated and remote shutdown equipment provided to comply with the requirements of Appendix R appears to consider post-fire safe shutdown equipment as a stand-alone component of the plant's fire protection program. While it is acknowledged that fires are a significant contributor in probabilistic risk assessments, these risk assessments are not generally driven by fires in the control room because the control room is continuously manned. The Staff's position fails to recognize the integral role of the post-fire safe shutdown equipment within the fire protection program and the limited role of the alternate/dedicated and remote shutdown panels.*

Both the Branch Technical Position CMEB 9.5-1, "Guidelines for Fire Protection for Nuclear Power Plants" and Appendix R to 10 CFR 50, "Fire Protection for Nuclear Power Facilities Operating prior to January 1, 1979," describe the means for ensuring a safe shutdown capability. Basically, four means are provided for ensuring a post-fire safe shutdown capability: 1) Separation by a fire barrier having a 3-hour rating; 2) Separation by a horizontal distance of more than 20 feet with protection from fire detectors and an automatic fire suppression system; 3) Enclosure in a fire barrier having a 1 hour rating with protection from fire detectors and an automatic fire suppression system; and 4) Providing an alternative or dedicated shutdown capability with protection from fire detector and a fixed fire suppression system (Appendix R only). The cold shutdown portion of the safe shutdown capability also has the option of allowing post-fire repairs to ensure the safe shutdown capability. Each of the means for ensuring a post-fire safe shutdown capability are integrated with various fire protection features including barriers, detectors and suppression.

The Industry believes the alternate/dedicated and remote shutdown equipment is an integral part of the overall fire protection program and that the overall fire protection program is adequately addressed by licensee fire protection programs.

Staff Position:

It is the Staff position that the criteria governing the design of plant safe shutdown capability from outside the control room are 10 CFR 50 Appendix A, GDC 19 and 10 CFR 50 Appendix R. The Staff position for technical specifications to meet the post-fire safe shutdown capability of Appendix R was provided through a series of Generic Letters (GL) beginning with GL 81-12, "Fire Protection Rule" (February 20, 1981). This was further supported by the issuance of Generic Letters 86-10 and 88-12.

Industry Position:

While the Industry agrees that criteria governing the design of plant safe shutdown capability from outside the control room are 10 CFR 50 Appendix A, GDC 19 and 10 CFR 50 Appendix R, the Industry does not agree that these requirements have to be in the Technical Specifications to ensure that they are met. Neither GDC 19 or Appendix R directly require Technical Specifications. GDC 19 does not require redundant equipment to perform this function and Appendix R does not require redundant or safety related equipment and states, "The shutdown capability for specific fire areas may be unique for each such area, or it may be one unique combination of systems for all such areas". Both GDC 19 and Appendix R recognize the need for procedures to implement the capability for shutdown outside the control room. And while the Staff points to their issuance of GL 81-12, GL 86-10 and GL 88-12 to demonstrate their requirement for Technical Specifications, the reality is that the Industry has not been required to include Technical Specifications and has demonstrated the ability to adequately address these requirements through licensee controlled programs. The history and some background around the Staff's actions are as follows:

- *The Standard Technical Specifications (STS) prior to and after GL 81-12 did not include TS required as designated in GL 81-12*
- *The technical Staff (then the Chemical Engineering Branch) had attempted to convince NRC management that the STS and plants in the NTOL process should include TS as required in GL 81-12 and that NRC management stated this position was inappropriate at that time due to the following:*
 1. *Not all plants were Appendix R plants and the reviews were different in scope.*
 2. *The NRC was still attempting to resolve the Appendix R issue and the NRC regulatory position.*
 3. *The STS and NTOL plants include Remote Shutdown System TS to cover the GDC 19 habitability concerns.*

The NRC changed its philosophy and requirements in late 1982, that fire protection related systems should not require plant shutdown - the STS was changed accordingly.

The issuance of GL 86-10 and the NRC philosophy that fire protection related systems should and could be adequately controlled procedurally and under a 50.59 review process.

The issuance of GL 88-12 which was a clarification of GL 86-10 and additional information gained from those plants implementing the requirements of GL 86-10 and GL 88-12 stated that the NRC approved Fire Protection Program must be incorporated in the FSAR and defined the NRC approved Fire Protection Program as :....includes the fire protection and post-fire safe shutdown systems necessary to satisfy NRC guidelines and requirements...."

The Technical Specification Improvement Program (TSIP), which included the Commission Interim Policy Statement (IPS, February, 1987) criteria, established those items that should be included in the Technical Specifications and those items which could be relocated and controlled by the licensee. This criteria did not identify fire protection or Appendix R Safe Shutdown related TS as being those meeting the criteria for inclusion in the Technical Specifications.

Very few STS plants presently have TS on Appendix R Safe Shutdown Equipment (most STS plants have Remote Shutdown GDC 19 requirements) and the vast majority of custom TS plants have neither - only a handful of custom TS plants have Appendix R Safe Shutdown Equipment TS, such as Monticello and DC Cook, and these plants were individually required to include these TS.

Browns Ferry was able to demonstrate to the Staff the acceptability of controlling Appendix R Safe Shutdown Equipment programmatically outside of the Technical Specifications in 1989.

Staff Position: *The list of instrumentation and equipment not already addressed in the Technical Specifications which would be included to meet the alternate/dedicated shutdown equipment is small.*

Industry Position: *The Appendix R alternate and dedicated shutdown capability section states "The shutdown capability for specific fire areas may be unique for each such area, or it may be one unique combination of systems for all such areas. Procedures shall be in effect to implement this capability". There are a multitude of varied scenarios which could present themselves where any number of alternate capabilities could be used to satisfy the safe shutdown function. A representative list of equipment from San Onofre is attached. This list is sufficiently large to demonstrate that if these systems were in the Technical Specifications, there would be a severe limit placed*

on the licensee as to which subset of systems could be used in different scenarios. And with an LCO and a corresponding Completion Time, the licensee would be required to seek formal relief from the NRC for continued operation where the level of degradation does not impair at all the capability for alternate safe shutdown in the event of a fire.

The Industry shares the NRC's concern for ensuring that alternative and dedicated shutdown capability in the event of a fire inside or outside the control room be maintained. The Industry believes that it has demonstrated the capability over the past 12 years to ensure this capability is maintained through programs and procedures which address the entire fire protection measures spectrum. These programs provide requirements for periodic testing and actions for impairment of these equipment. These programs have and continue to be the subject of NRC review and audit. The Industry does not believe that the NRC or the Industry stand to gain any improvement in safety by requiring these systems in the Improved Technical Specifications after there has been 12 years of experience which indicates that this equipment can be adequately controlled through license programs and procedures.

**RESPONSE TO NRR STAFF POSITION ON TECHNICAL SPECIFICATIONS
FOR ALTERNATE/DEDICATED AND REMOTE SHUTDOWN EQUIPMENT
TO COMPLY WITH THE REQUIREMENTS OF APPENDIX R**

SUMMARY

The NRC Staff's position that the Standard Technical Specifications (STS) should include alternate/dedicated and remote shutdown equipment provided to comply with the requirements of Appendix R appears to consider post-fire safe shutdown equipment as a stand-alone component of the plant's fire protection program. The Staff's position fails to recognize the integral role of the post-fire safe shutdown equipment within the fire protection program and the limited role of the alternate/dedicated and remote shutdown panels. In addition, the Staff's position on alternate/dedicated and remote shutdown equipment is inconsistent with the guidance provided by Generic Letter 88-12 regarding removal of the fire protection requirements from the Technical Specifications. Further, it is recommended that Appendix R post-fire safe shutdown requirements not be given consideration in establishing the requirements for the Improved Standard Technical Specifications.

DISCUSSION

It appears that the basis for the Staff position centers on the Staff's statements that "Probabilistic risk assessments have generally confirmed that fires are a major contributor to core damage events" and that "Because fire (either inside or outside the control room) can be a significant contributor to the core melt frequency and because uncertainties with fire initiation frequency can be significant." While it is acknowledged that fires are a significant contributor in probabilistic risk assessments, these risk assessments are not generally driven by fires in the control room because the control room is continuously manned. Also, the Staff position offers no evidence that the proposed Technical Specifications would reduce the risk from fires. Technical Specifications may not necessarily improve the reliability of equipment in risk assessments when factors such as testing and failure to return equipment to service are considered. Also, the remote shutdown panels have such a limited role in the post-fire safe shutdown capability, improvement in the reliability of this equipment may have no impact on the risk assessments.

Both the Branch Technical Position CMEB 9.5-1, "Guidelines for Fire Protection for Nuclear Power Plants" and Appendix R to 10 CFR 50, "Fire Protection for Nuclear Power Facilities Operating prior to January 1, 1979," describe the means for ensuring a safe shutdown capability. Basically, four means are provided for ensuring a post-fire safe shutdown capability: 1) Separation by a fire barrier having a 3-hour rating; 2) Separation by a horizontal distance of more than 20 feet with protection from fire detectors and an automatic fire suppression system; 3) Enclosure in a fire barrier having a 1 hour rating with protection from fire detectors and an automatic fire suppression system; and 4) Providing an alternative or dedicated shutdown capability with protection from fire detector and a fixed fire suppression system (Appendix R only). The cold shutdown portion of the safe shutdown capability also has the option of allowing post-fire repairs to ensure the safe shutdown capability. Each of the means for ensuring a post-fire safe shutdown capability are integrated with various fire protection features including barriers, detectors and suppression. Even the alternate and dedicated shutdown per Appendix R requires detection and suppression and fire barriers to achieve physical independence. In the event of a "design basis" fire, the reliability of the post-fire shutdown equipment will be immaterial if the fire protection measures fail.

In ensuring a post-fire safe shutdown capability, most plant areas are protected by either separation by a 3-hour fire rated barrier, separation by more than 20 feet, or 1-hour fire rated enclosures. Alternate and dedicated shutdown capability is generally limited to the control room, cable spreading room and one or two other fire areas. For plant areas not utilizing alternate and dedicated shutdown, Appendix R and the Branch Technical Position does not require that safe shutdown be limited to equipment covered by Technical Specification. And, Generic Letter 88-12 recommends removal of these fire protection measures from the Technical Specifications.

With respect to safe shutdown equipment, most, if not all, major equipment used for post-fire safe shutdown is covered by current Technical Specifications. But, the same may not be true of the controls and indication used for these plant areas. For example, a typical PWR has several channels of steam generator level, both wide range and narrow range, all of which are not covered by Technical Specifications. Only one channel of steam generator level, preferably wide range, needs to be protected to ensure a post-fire safe shutdown capability. Similar conditions exist with the diagnostic instrumentation especially when local instrumentation is used. For controls, not all flow paths of a system are covered by Technical Specifications. Systems such as CVCS may rely upon a flow path that is not covered by Technical Specifications. Also, manual operation of valves is utilized as part of most post-fire shutdown capabilities. Very seldom is the capability to manually operate a motor, air or solenoid-operated valve included in the Technical Specifications. The Staff has not proposed that the balance of the post-fire shutdown capability be added to Technical Specifications. Thus, not all the equipment used for fires outside the control room would be included in Technical Specifications.

As the Staff accurately pointed out, the post-fire shutdown capability for the control room has "little flexibility, minimal diversity, and generally no redundancy". However the Staff did not note that the same conditions are true of most plant areas and the control room has the additional benefit of continuous manning not found in other plant areas. Further, both Appendix R and the Branch Technical Position provide quite a bit of latitude in the design of alternate/dedicated and remote capabilities. On one side of the spectrum, an alternate/dedicated shutdown capability could consist of one panel that provides complete control and indication of the post-fire shutdown capability. The other end of the spectrum would be an alternate/dedicated shutdown capability that has the instrumentation spread out in several different locations with controls being performed manually at the equipment. The actual alternate and dedicated designs are spread between the two extremes. Generally, alternate/dedicated capabilities rely upon the coordination of two operators at different panels (for example: remote shutdown panel and a local diesel generator panel) supplemented by two to four operators performing manual actions throughout the plant. As proposed, the Staff position would result in a greater Technical Specification impact on the plant designs that are closer to the one panel capability. The proposed position does not address manual operation of equipment nor does it address communication equipment and emergency lighting. From a risk assessment viewpoint, improvements to the reliability of remote shutdown panels may very well be insignificant when the post-fire shutdown capability is dependent upon manual operations performed under adverse conditions.

As a side note the proposed position does not address the instrumentation required by IE Information Notice 84-09 and does not address support equipment such as HVAC. Also the position is silent on the need to include that equipment which provides protection from fire induced failures of associated circuits.

Finally, while the Staff has been consistent in their issuance of generic letters, the Staff has not been consistent in implementation. To date only a few plants have implemented Technical Specifications for alternate/dedicated shutdown equipment and the Technical Specifications that have been issued address only a portion of the post-fire safe shutdown equipment. In response to Generic Letter 81-12, only a few licensees proposed Technical Specifications. At that time, the Staff was advising licensees to defer Technical Specifications until the Staff could formulate a position. Most of the original SER's written for Appendix R avoided the issue of Technical Specifications. Given that the Staff has allowed many of the plants to operate 4 to 5 years with some 8 to 9 years to complete modifications related to Appendix R and has allowed a majority of the plants to operate until now, 10 years after Appendix R was issued, without the proposed Technical Specifications, what risk is being addressed by the Staff's proposed position? Appendix R did not directly require that the post-fire alternate/dedicated shutdown equipment be covered by Technical Specifications. Also, since Appendix R permitted use of non-safety related equipment, the Appendix R requirements, in a sense, recognized that the alternate/dedicated equipment being added to the plants' capabilities may not be covered by Technical Specifications. With the improvement in plant safety achieved by the post-fire safe shutdown capabilities, the improvement gained from Technical Specifications may very well be insignificant.

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CONCLUSION

In summary, the control room fire scenario is generally not the driver in fire risk assessments. Technical Specifications do not necessarily (in risk assessments) improve the reliability of equipment and thereby, reduce risk. And, the weaknesses in post-fire safe shutdown capabilities (multiple manual actions performed under adverse conditions) are not addressed by the proposed position. The proposed Technical Specifications appear inconsistent with decisions behind Generic Letter 88-12 for removal of the fire protection requirements from the Technical Specifications. The proposed position is incomplete in its attempt at reducing the risk from fires. And the industry may be better served if the entire safe shutdown equipment from manual operation of valves to repair equipment and emergency lighting and communication equipment is included in an administrative program along with the fire protection measures, like those in the plants which have implemented GL 86-10 and GI 88-12.