

NOV 03 1982

Docket Nos.: STN 50-482  
and STN 50-483

Mr. D. F. Schnell  
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Union Electric Company  
P. O. Box 149  
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Mr. Glenn L. Koester  
Vice President - Nuclear  
Kansas Gas & Electric Company  
201 North Market Street  
Wichita, Kansas 67201

Dear Gentlemen:

SUBJECT: CLARIFICATION OF SRP SECTION 7.4 AND REQUEST FOR INFORMATION  
REGARDING FIRE PROTECTION FOR CALLAWAY AND WOLF CREEK

Enclosed is the NRC staff guidance providing clarification of the requirements in SRP 7.4. This guidance should be used when considering any design changes from the Appendix R review. In addition, you are requested to provide by December 17, 1982, a response showing how the SNUPPS design does or will comply with each item of the first seven guidelines.

If you have any questions concerning this matter, please contact the licensing project manager for Callaway or Wolf Creek, Dr. G. E. Edison and J. B. Hopkins, respectively.

Sincerely,

Original signed by:  
B. J. Youngblood

B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Enclosure:  
As Stated

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SUBJECT: CLARIFICATION OF SRP SECTION 7.4

Enclosed is the NRC staff guidance providing clarification of the requirements in SRP 7.4. This guidance should be used when considering any design changes from the Appendix R review. In addition, provide by December 17, 1982, a response to the first seven guidelines showing how the SNUPPS design does or will comply with each item.

If you have any questions concerning this matter, please contact the licensing project manager for Callaway or Wolf Creek, Dr. G. E. Edison and J. B. Hopkins, respectively.

Sincerely,

B. J. Youngblood, Chief  
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ICSB GUIDANCE FOR THE INTERPRETATION OF GENERAL DESIGN

CRITERIA 19 CONCERNING REQUIREMENTS

FOR REMOTE SHUTDOWN STATIONS

A. BACKGROUND

GDC 19 requires that equipment at appropriate locations outside the control room be provided to achieve a safe shutdown of the reactor. Recent reviews of remote shutdown station designs have demonstrated that some designs cannot accommodate a single failure in accordance with the guidance of SRP Section 7.4 (Interpretation of GDC-19). The following provides supplemental guidance for the implementation of the requirements of GDC-19 concerning remote shutdown stations. Requirements for remote shutdown capability following a fire are detailed in Appendix R to 10 CFR 50. It should be noted that although GDC 19 and Appendix R requirements are complementary, the potential exists that modifications to bring a design into conformance with GDC 19 will violate Appendix R criteria and vice versa. For example, remote manual control devices for a second division of instrumentation and controls added to satisfy single failure requirements would not be acceptable if the added devices were located in the same fire area as existing transfer switches in the redundant division. In addition, transfer switches added to isolate the remote shutdown equipment from the control room fire area would not be acceptable if they disable ESF actuation, unless this is done in accordance with item B6 below. The acceptability of remote shutdown station designs given a fire is determined by the Auxiliary Systems Branch (ASB) as outlined in Section 9.5.1 of the SRP.

B. ICSB GUIDANCE

To Meet GDC-19 (As Interpreted in SRP Section 7.4)

- 1) The design should provide redundant safety grade capability to achieve and maintain hot shutdown from a location or locations remote from the control room, assuming no fire damage to any required systems and equipment and assuming no accident has occurred. The remote shutdown station equipment should be capable of maintaining functional operability under all service conditions postulated to occur (including abnormal environments such as loss of ventilation), but need not be environmentally qualified for accident conditions unless environmental qualification is required for reasons other than remote shutdown. The remote shutdown station equipment, including indicators, should be seismically qualified.
- 2) Redundant instrumentation (indicators) should be provided to display to the operator(s) at the remote shutdown location(s) those parameters which are relied upon to achieve and verify that a safe shutdown condition has been attained.
- 3) Credit may be taken for manual actions (exclusive of continuous control) of systems from locations that are reasonably accessible from the Remote Shutdown Stations. Credit may not be taken for manual actions involving jumpering, rewiring, or disconnecting circuits.
- 4) The design should provide redundant safety grade capability for attaining subsequent cold shutdown through the use of suitable procedures.

- 5) Loss of offsite power should not negate shutdown capability from the remote shutdown stations. The design and procedures should be such that following activation of control from the remote shutdown location, a loss of offsite power will not result in subsequent overloading of essential buses or the diesel generator. Manual restoration of power to shutdown loads is acceptable provided that sufficient information is available such that it can be performed in a safe manner.
  
- 6) The design should be such that if manual transfer of control to the remote location(s) disables any automatic actuation of ESF equipment, this equipment can be manually placed in service from the remote shutdown station(s). Transfer to the remote location(s) should not change the operating status of equipment.
  
- 7) Where either access to the remote shutdown station(s) or the operation of equipment at the station(s) is dependent upon the use of keys (e.g., key lock switches), access to these keys shall be administratively controlled and shall not be precluded by the event necessitating evacuation of the control room.
  
- 8) The design should comply with the requirements of Appendix R to 10 CFR 50.