

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR

7/8/94

Date

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Initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER DE PLANQUE

SUBJECT: SECY-94-127 - OPTIONS FOR RESOLVING THE
THERMO-LAG FIRE BARRIER ISSUES

APPROVED x in part DISAPPROVED x in part ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

See attached comments.

9407120359 940617
PDR COMMS NRCC
CORRESPONDENCE PDR

E. Gail de Planque

SIGNATURE

RELEASE VOTE

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WITHHOLD VOTE

☐

June 17, 1994

DATE

ENTERED ON "AS" Yes _____ No _____

120001

DF02

Commissioner de Planque's comments on SECY-94-127

I thank the staff for the considerable effort expended on examining the Thermo-Lag issue with its many complexities. I also thank the ACRS for its timely advice on this matter.

Staff should proceed with option 4, i.e., the development of a performance-based fire protection rule, as already planned in response to the continuing program for regulatory improvement. Since the target date for a final rule, August 1996, may be overly optimistic, the fire barrier issue should continue to be addressed under option 1, compliance with existing NRC fire barrier requirements. However, in granting exemptions, the staff should, in consultation with industry, look beyond exemptions already in common use to those incorporating more current techniques with respect to analysis and methodology, including performance-based approaches, and where possible, develop generic approaches to such exemptions. The responsibility for developing the technical basis of any new exemptions acceptable to the staff should lie with the licensees.