



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

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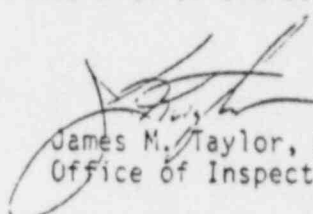
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MEMORANDUM FOR: Thomas E. Murley, Regional Administrator, Region I
J. Nelson Grace, Regional Administrator, Region II
James G. Keppler, Regional Administrator, Region III
Robert D. Martin, Regional Administrator, Region IV
John B. Martin, Regional Administrator, Region V

FROM: James M. Taylor, Director
Office of Inspection and Enforcement

SUBJECT: SAFE SHUTDOWN INSPECTION PROGRAM

One of the recommendations to the Executive Director for Operations of the Fire Protection Steering Committee is to conduct expedited inspections of safe shutdown aspects of various licensees in order to give the staff additional information on the status of implementation of fire protection features. These expedited inspections would require a substantial reprogramming of resources from the planned inspection program. While I support limited planning and preparation for these inspections, implementation of the expedited inspection recommendation should not proceed in advance of approval by the EDO of the Steering Committee recommendation in this area. Until further guidance is given on this matter, fire protection inspections should continue to focus on safe shutdown requirement compliance at NTOL plants and plants that have completed modifications in accordance with 10 CFR 50, Appendix R.


James M. Taylor, Director
Office of Inspection and Enforcement

cc: T. Rehm, EDO

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MAR 06 1985

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Enclosure 3

MEMORANDUM FOR: James Knight, Acting Director
Division of Engineering
Office of Nuclear Reactor Regulation

FROM: James M. Taylor, Director
Office of Inspection and Enforcement

SUBJECT: RESOURCE ESTIMATES FOR PROPOSED EXPEDITED FIRE PROTECTION
INSPECTIONS

By a memorandum dated December 10, 1984, the EDO requested that IE provide information on resource impacts associated with the expedited fire protection inspection as proposed by the Fire Protection Steering Committee.

The IE staff has evaluated the resources associated with the proposed expedited inspection and notes the following:

- a. The total estimated resources required to perform the expedited inspections would be approximately 10 staff years of regional resources. Based on already planned fire protection inspections, this represents approximately 8 staff years additional resources. The staff also estimates that contractor assistance would be increased by approximately \$500K to support the expedited inspection program. Using the \$500K for the expected inspection effort would exhaust all routine technical support funds for the regions, as well as significantly deplete funding set aside to deal with problem facilities.
- b. Approximately 4 staff years of the additional resources can be reprogrammed from routine fire protection inspection effort. This effort is primarily associated with fire protection inspection of features other than safe shutdown such as fire brigade training, and fire protection program review. It is important to note that this reprogramming will direct programmatic fire protection reviews away from a large number of plants in order to focus on safe shutdown inspections at a fewer number of plants.
- c. The remaining 4 staff years of resources can be reprogrammed from engineering and project inspections. Inspections impacted would primarily be enhanced efforts directed at poor overall licensee performers and efforts directed at licensee functional areas identified by the region during SALP as needing more inspection attention.

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James Knight

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As discussed above, the impact on IE inspection programs would be significant. I therefore do not support implementing the Steering Committee's recommendation for expedited inspection effort and instead recommend that the safe shutdown inspections be conducted as previously planned.

Original Signed By
James M. Taylor

James M. Taylor, Director
Office of Inspection and Enforcement

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Attachment C

NRR Comments on the Steering Committee Report

This office has reviewed the report of the Fire Protection Policy Steering Committee and supports with one minor difference the conclusions and recommendations contained therein. We believe that implementation of these recommendations will be helpful in furthering the Commission's objectives of timely and appropriate compliance with Appendix R to 10 CFR 50.

Recommendation d. of the May 3rd letter to me suggests the use of the proposed technical specifications in future operating licenses as appropriate (in addition to providing them to the NRR Technical Specifications Improvement Project). We have not included this clause in the Commission paper recommendations because several proposed tech specs will probably be backfit items and can be better resolved in the context of technical specification improvements.