

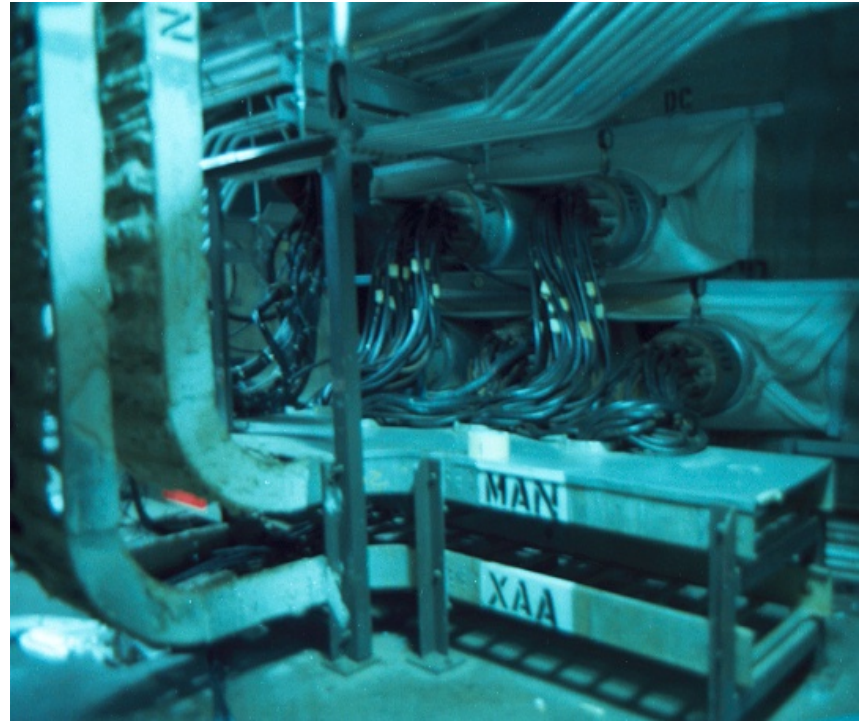


Fire Protection:

When is an Order
Not an Order?

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Nuclear Information and Resource Service
U.S. NRC Regulatory Information Conference
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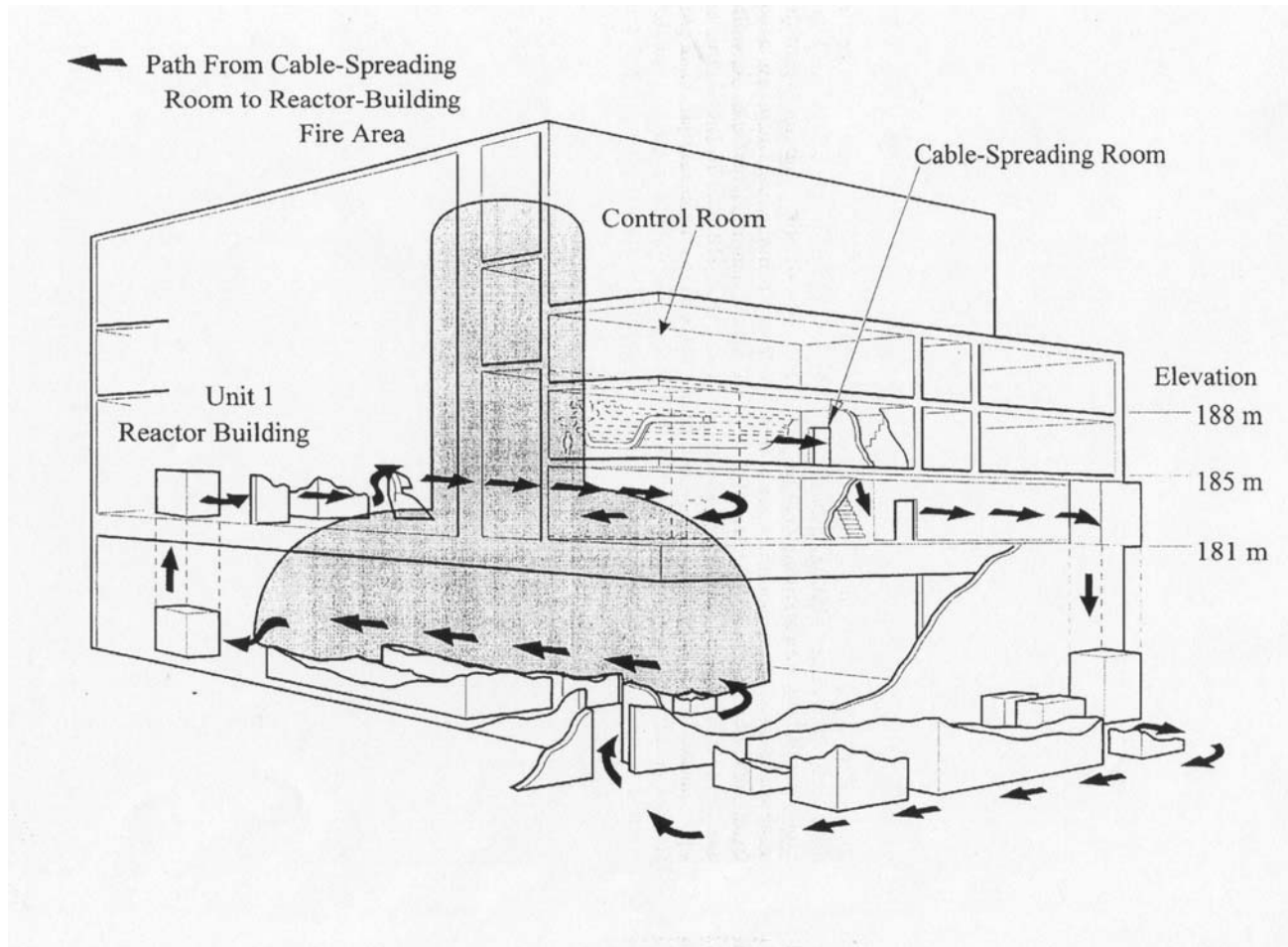
The Browns Ferry Fire & Post-fire Safe Shutdown Requirements



From “Inoperable” Fire Barriers to Corrective Actions to Confirmatory Orders

- Thermo-Lag 330-1 fire barriers widely deployed in the nuclear power industry in the 1980’s determined to be “inoperable”**
- NRC issues Information Notices, Generic Letters and Bulletins 1991 through 1995**
- NRR meets with industry from 1992-1998 for commitments to corrective actions programs**
- NRC issues Confirmatory Action Orders 1998**

Operator Manual Actions substituted for approved corrective actions



When is an Order not an Order?

Thermo-Lag Confirmatory Action Orders

- **NIRS compared sites under Confirmatory Orders with NRC's new Triennial Fire Protection Baseline Inspections**
- **Inspections verified “a significant number of local manual actions have been incorporated in order to resolve Thermo-Lag issues.”**
- **“The licensee did not pursue with NRR an exemption from complying with III.G.2 for any of its manual actions.”**

**Operator manual actions:
not equivalent to Appendix R III.G.2**

- During a fire, control room operations are more reliable than local operator manual actions (BTP 9.5.1 and III.G.2)**
- Abandoning III.G.2 circuit protection for operator manual actions constitutes a significant safety violation & reduction of Defense-In-Depth**
- Turns back fire protection for safe shutdown to pre-Browns Ferry fire**

Risk informing fire protection for reactor security infrastructure

