

December 15, 2006

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS - SECY-06-0196 - ISSUANCE OF  
GENERIC LETTER 2006-XX, "POST-FIRE SAFE-SHUTDOWN  
CIRCUITS ANALYSIS SPURIOUS ACTUATIONS"

The Commission has disapproved the issuance of this Generic Letter at this time and in its present form. The present draft of the proposed Generic Letter does not contain the necessary specificity for a licensee to understand what process will be sufficient to meet the analysis needs and information demands of the draft Generic Letter. Further, the staff has not made a compelling case for its backfit position. Because immediate regulatory action is not needed due to the several levels of defense-in-depth in place for fire protection, further thought and care can be taken to ensure the resolution of this licensing issue has a technically sound and traceable regulatory footprint that will provide permanent closure for this issue.

The staff should continue to encourage licensees to transition to 10 CFR 50.48(c) and NFPA 805. The staff should examine licensee analysis methods in this area, including those using system or functional scenario development approaches, and using the normal public regulatory process to enable stakeholder engagement, develop or endorse guidelines that provide a clearly defined method of compliance for licensees who do not choose to utilize the risk-informed approach contained in 10 CFR 50.48(c). In addition, the time frame for resolution for plants that do not choose the risk-informed option should be about the same as the time for plants who do select the risk-informed 10 CFR 50.48(c) approach. If still appropriate, the staff should forward for Commission approval a revised Generic Letter that provides clear options, methods, and guidelines for methods of compliance.

The staff should inform the guidelines for acceptable methods of compliance with the results of the ongoing CAROLFIRE cable testing program being conducted by the Office of Regulatory Research.

cc: Chairman Klein  
Commissioner McGaffigan  
Commissioner Merrifield  
Commissioner Jaczko  
Commissioner Lyons  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR