

January 8, 2001

**SUBJECT: REGION III FIRE PROTECTION WORKSHOP
JANUARY 3-4, 2001**

Location: Region III Office

Purpose: Discuss perceived problems/issues related to the new triennial fire protection inspection, document those that need resolution, and initiate resolution. Also, share some knowledge and methods regarding the inspections. The agenda is attached.

Participation: Jim Dyer (RIII Regional Administrator) welcomed participants. Jack Grobe (RIII DRS Director) participated in the beginning and ending of the workshop. Ron Gardner (RIII Electrical Branch Chief), NRR fire protection personnel (Mark Salley, Phil Qualls, and Dan Frumkin), an NRR PRA person (J. S. Hyslop), and representative inspectors from all NRC regions participated in all discussions.

Accomplishments:

1. Several issues needing resolution were identified. These are primarily licensing basis issues that have arisen during inspections and that are not currently being adequately addressed. Examples include:
 - a. Licensee's authority and processes for changing the fire protection program are not well understood. 50.59 does not prevent wholesale removal of fire protection features. License conditions allow changes to fire protection that do not 'adversely affect' the ability to safely shut down the reactor during a fire. However, the term 'adversely affect' is not understood. Some licensees are removing all Thermo-lag fire barrier material, compensating with numerous operator actions as equivalent to barriers, and saying the changes do not 'adversely affect' safe shutdown because they do not prevent safe shutdown. The NRC has not yet developed sufficient PRA risk evaluation tools to adequately evaluate potential increases in risk with added operator actions.
 - b. The term 'associated circuit' is not clearly understood. The NRC is currently suspending inspection & enforcement of spurious actuations of associated circuits, but we are still inspecting those 'protected train' circuits that are required to be protected from fire damage. Region III said they understood, but their understanding was different from that of RII. For example, RIII thought that a protected HPI pump's normally open discharge MOV would be a protected circuit, but RII had considered it an associated circuit. Also, RIII thought that the HPI pump minimum flow valve would be an associated circuit but RII had considered it a protected circuit.
 - c. NRC administrative methods for resolving licensing basis issues are not well understood. Region III planned to submit all such potentially green issues to NRR in TIAs, but other regions had been told that NRR would not accept TIAs on green issues. Also, NRR actions on 'generic issues' such as HEMYC wrap

U/I

are not well documented (no NRR tracking numbers or assigned actions, responsibilities, and due dates are readily available to the regions.)
Consequently, several regions have open URIs on HEMYC wrap but NRR resolution activity on the issue has apparently died.