

**From:** Phil Qualls *NRR*  
**To:** James Bongarra  
**Date:** 10/2/02 3:31PM  
**Subject:** HUMAN FACTORS CONSIDERATIONS FOR MANUAL ACTIONS FOR FIRE PROTECTION

Jim,

We, Fire Protection Engineering Section, are working on a proposed rulemaking effort to revise 10 CFR 50, Appendix R, Section III.G.2 to allow certain manual actions to be used instead of a fire barrier.

We have found, during recent inspections, that licensees are crediting manual actions for fire damaged circuits. The current rule does not allow this. We agree with industry that some may be feasible. Most we have reviewed have not had a very good licensee analysis.

Based on previous inspection findings, generally things licensees failed to do, we prepared inspector specific guidelines to evaluate current licensee manual actions to determine if the actions are feasible. Dave Desaulniers suggested that you might know of a NUREG which gives guidance on temperature-humidity-time considerations. If so we will reference it.

Who is your section chief so we can get you folks formally involved? Due to the rulemaking effort, we should have formal Human Factors review. Anyway, as I understand it, the criteria listed will go to the regions for a 30 comment prior to being issued for interim inspection guidance. During this time we can incorporate any Human Performance insights you folks can provide. Your help would be appreciated.

Thanks

Phil Qualls

**CC:** Eric Weiss; Peter Koltay

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