



WHEN CONSIDERING THE RANGE OF SAFETY ISSUES, THE THREAT OF FIRE IS REAL AND PALPABLE.

SIGNIFICANT FIRES AT NUCLEAR POWER PLANTS REALLY CAN AND ACTUALLY DO HAPPEN.

THEY HAVE RESULTED IN SIGNIFICANT DAMAGE AT BOTH DOMESTIC AND FOREIGN NUCLEAR POWER PLANTS.

✓ FOR EXAMPLE, I WOULD CALL YOUR ATTENTION TO INFORMATION NOTICE 2002-77

FEW PEOPLE IN THIS BUSINESS ACTUALLY BELIEVE THAT A NUCLEAR POWER PLANT WILL EXPERIENCE A LARGE BREAK LOCA.

BUT EACH OF US IN THIS ROOM KNOWS THAT A SIGNIFICANT FIRE SOMETIME DURING THE LIFE OF A PLANT IS A REAL POSSIBILITY.

SINCE WE HAVE STARTED CONDUCTING TRIENNIAL FIRE PROTECTION INSPECTIONS, WE HAVE IDENTIFIED SEPARATION ISSUES AT A NUMBER OF PLANTS.

~~EVEN SO, IN MY EXPERIENCE, ANO IS A CLEAR OUTLIER.~~

~~THIRD PARTY ASSESSMENTS CONDUCTED AT ANO IN THE LATE 1980s REINFORCE MY VIEW.~~

MENT REALL

AS YOU ~~RECALL~~, WE HAD AN ENFORCEMENT CONFERENCE WITH YOU IN 1997 FOLLOWING A 1996 FIRE INSIDE THE UNIT 1 REACTOR CAVITY.

THERE IS A PARALLEL WITH THAT CASE AND THIS ONE. IN THAT CASE, THE DESIGN OF THE REACTOR COOLANT PUMP LUBE OIL COLLECTION SYSTEM NEVER MET THE REQUIREMENTS OF APPENDIX R, III.O; HOWEVER, NO EXEMPTION WAS SOUGHT OR GRANTED.

DURING THE CONFERENCE, ENTERGY INDICATED THAT THE PLANT STAFF DID NOT HAVE THE RIGHT LEVEL OF AWARENESS FOR MONITORING COMPLIANCE WITH APPENDIX R, BUT THAT THE ANO STAFF HAD BEEN SENSITIZED TO THIS AND THAT IMPROVEMENTS HAD BEEN MADE.

AND YET, WE ARE HERE TODAY, MORE THAN 6 YEARS LATER, DISCUSSING THESE ISSUES.

D/66

MY POINT WITH ALL OF THIS IS THAT WHATEVER CORRECTIVE ACTIONS
ENTERGY ULTIMATELY TAKES, THESE ACTIONS WILL NEED TO BE BOTH
EFFECTIVE AND LASTING REGARDLESS OF THE SIGNIFICANCE OF THESE
INSPECTION FINDINGS.