

From: Linda Smith *LS*
To: Charles Marschall; Eric Weiss; Phil Qualls; Rebecca Nease
Date: 11/21/02 11:10AM
Subject: FYI - ANO answer to Elmo's questions

Following our public meeting, Elmo asked ANO to give him their view on two issues. We had a call today to listen to their view. For everyone's general information I will sum up and paraphrase the question and their view.

First Question: How does ANO interpret May 1983 SER, which basically says the all of the configurations that are not ASD will meet III.G.2?

ANO saw this SER as a summary level SER that communicated the staffs overall approval of their methodology, i.e., considering all that had gone on before the staff was in summary evaluating their program and concluding that it would result in compliance with III.G.2.

During this portion of the call, we also agreed that the primary driver for our difference in perspectives is rooted in the definition of a required circuit. We believed required circuits include all cabling that can affect credited components. They believe required circuits only include those needed to operate credited equipment from the credited location [control room or emergency control station].

Second Question: How do they interpret GL 86-10 claim that Appendix R, III.G.2a, b and c provide the methods that are acceptable for assuring that necessary structures, systems and components are free of fire damage. i.e. are capable of performing its intended function during and after the postulated fire, as needed?

They made two points. First they stated that you had to have been there listening to the evolution of requirements to understand how to interpret this section. People that had attended the 1984 workshop, had commented on GL 95-10 [a precursor to GL 86-10], and were aware of the information and notes from the steering committee, would read GL 86-10 the same way that they do.

Second they believe that a method described in III.G.2 must be used to protect required circuits. They believe their manual actions from an emergency control station will make the other circuits unnecessary and therefore not required.

Overall, they point to GL 86-10 text that specifically allows manual actions from an emergency control station for meeting III.G.1.B [equipment needed for ASD] and infer that the language applies to III.G.1.A [equipment needed for HSD].

They support their claim that this is a reasonable inference by referring to an NRR inspection of a 1984 submittal related to change from fire zone to a fire area safe shutdown analysis.

In this submittal they described the method of crediting manual operation of some valves even when they were in the same fire area as the fire [the fire areas are very large]. In the submittal, they did not call out all of the specific examples for NRR approval. They claim that NRR later inspected the specific examples where manual actions were used to address deficiencies that were identified as a result of changing the safe shutdown analysis from a zone based analysis to a fire area based analysis. They claim that the inspection found that crediting manual actions needed because of the change from a zone analysis to an area analysis was acceptable.

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