

10/16/02
Muehle

October 16, 2002

MEMORANDUM TO: J. Luehman, Deputy Director
Office of Enforcement

William D. Beckner, Program Director
Operating Reactor Improvements Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Cynthia Carpenter, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: John N. Hannon, Chief/RA/
Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

SUBJECT: MANUAL ACTIONS

We are providing, in the attached, a list of proposed draft inspection criteria regarding manual actions as an acceptable alternative to the separation criteria in 10 CFR Appendix R III.G.2. These criteria are also intended to support the development of the rulemaking plan by License Renewal and Standardization Branch (RPRP), the Interim Enforcement Policy to be developed by the Office of Enforcement (OE), the inspection guidance being developed by Inspection Program Branch (IIPB), and the Regulatory Information Summary (RIS) being developed by Operating Reactor Improvements Program (RORP).

Please have your staff contact work with Phil Qualls (415-1849) of my staff and keep him informed of your completion schedules so that these various products can be properly coordinated.

Attachment: As stated

Contact: Phil Qualls, NRR/DSSA/SPLB
415-1849

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DATE	10 /4/02	10 /10/02	10 /10 /02	10 /15/02	/ /02

ATTACHMENT

INSPECTION CRITERIA FOR FIRE PROTECTION MANUAL ACTIONS

LICENSING BASIS

Determine whether the manual action was previously approved by the staff. Refer to specific approval in the licensing basis. Review the scope and technical basis for the approval.

REQUIRED OR ASSOCIATED CIRCUIT

Determine whether the manual action is required due to fire effects on a REQUIRED circuit or an ASSOCIATED circuit? Associated circuits are currently under an inspection moratorium and any finding should be treated as an Unresolved Item.

DIAGNOSTIC INSTRUMENTATION

Determine whether adequate diagnostic instrumentation, unaffected by the postulated fire, is provided for the operator to detect the specific spurious operation that occurred. Some licensees may have protected only those circuits specified in Information Notice 84-09. Additional instrumentation may be needed to properly assess a spurious operation. Annunciators, indicating lights, pressure gages, and flow indicators are among those instruments that may need to be protected from the effects of a fire. Instrumentation should also be available to verify that the manual action accomplished the intended objective.

ENVIRONMENTAL CONSIDERATIONS

Review environmental conditions the operator may encounter while accessing and performing the manual action. Radiation levels should not exceed normal 10 CFR Part 20 limits. Emergency lighting should be provided as required in Appendix R, Section III.J or by the licensee's approved fire protection program. Temperature and humidity conditions should be reviewed to ensure that temperature and humidity do not affect the capability to perform the manual action. Fire effects should be reviewed to ensure that smoke and toxic gases from the fire do not affect the capability to perform the manual action.

STAFFING

Review licensee staffing to determine that adequate qualified personnel are available to perform the required manual actions and to safely operate the reactor.

COMMUNICATIONS

If manual action coordination with other plant operations is required, then communications capability must be protected from effects of a postulated fire.

SPECIAL TOOLS

If special tools are required, determine whether tools are dedicated and available in a nearby location.

TRAINING

Determine whether operator training on the manual actions and on the procedure is adequate and current.

ACCESSABILITY

Review accessability. If a ladder or other special access equipment is needed, verify the availability. Determine whether an operator can reach the required location without personal hazard.

TIMELINE

Review the licensee's thermo-hydraulic timeline and ensure that the manual actions can be accomplished before unrecoverable conditions occur.

PROCEDURES

Review procedural guidance to ensure that it is adequate and contained in an emergency procedure. Operators should not rely on having time to study normal plant procedures to find a method of operating plant equipment that is seldom used.

VERIFICATION AND VALIDATION

Determine whether the manual actions have been verified and validated by plant walkdowns using the current procedure. Determine whether the walkdowns were timed to assure accomplishment within required timeframes specified in the plant's safe shutdown analysis.