

0925 (11)

From: Charles R. Ogle
To: Isom, James
Date: 8/14/02 7:34AM
Subject: Fwd: IIIG2

Jim, I understand from the attached e-mail that you are the point of contact on this issue. Though I haven't been asked to comment, I would propose that the guidance be expanded to specifically address if the licensee's use of manual actions in a 3.G.2 fire area represents an "appropriate corrective action."

We had an inspector go to Harris and conduct a 95001 inspection for a white finding on a degraded fire barrier. The licensee has implemented manual actions in a 3.G.2 fire area which I expect (when we complete the inspection) will be dispositioned as a minor violation. (I understand from discussions with the fp folks in NRR that this is the course of action that we want to embark on and we are onboard.) However, it would be helpful in answering the question in section 02.03 of the 95001 module regarding the appropriateness of the licensee's corrective action if the situation of the CA's resulting in a minor violation was specifically addressed. (It might be helpful to distinguish the adequacy of the licensee's corrective actions from the failure of the licensee to get an exemption in the guidance.)

If you have a minute please call me at 404-562-4605 and we can discuss this.

CC: Carpenter, Cynthia; Coe, Doug; Hannon, John; Koltay, Peter; Lenahan, Joseph; Payne, Charlie

8/14
Spoke to Tim Isom & explained our needs
on 8/14/2.
I stressed need for guidance on
manual action → minor violation
→ 95001 / 95002.
I stressed timeliness.

N/7

From: John Hannon
To: Ogle, Charles R.
Date: 8/13/02 5:52PM
Subject: Fwd: IIIG2

Chuck, here is an update on the people you want to talk to.

John N. Hannon
Branch Chief
Plant Systems Branch
NRR

From: Peter Koltay
To: Eric Weiss; John Hannon; Leon Whitney; Phil Qualls; Roy Mathew
Date: 8/9/02 4:05PM
Subject: IIIG2

Doug Coe and I will be on annual leave next week and in order to keep the process moving we propose the following:

Please get OE support on providing relief from the requirements of IIIG2, introduction of manual actions in lieu of meeting fixed protection requirements as stated in IIIG2.

As soon as OE states that the proposed language is acceptable Jim Isom, acting for Doug, will E-mail the proposed change to the regional division directors for comments.

Jim will discuss the regional comments with you and develop the final language. It will be included into the inspection procedure.

CC: James Luehman

Determine whether the licensee has introduced manual actions in order to meet the requirements of 10CFR Part 50 section IIIG2 (e.g. while compensating for the disqualification of the use of thermo-lag as a fire barrier).

Identify two sample areas (if more than one) where licensee uses manual actions in lieu of required III.G.2 fire barriers and assess the effectiveness of such actions.

If the manual actions are feasible as described in the licensee's procedure(s) but the licensee failed to notify the NRC of the substitution of manual actions in place of fixed protection, treat the failure to notify the NRC of the change in methodology as a minor finding in accordance with IMC 0612.

If the manual actions as described in the procedure(s) do not have supporting analyses (e.g. operability evaluation in accordance with Generic Letter (GL) 91-18 Revision 1) treat the issue as unresolved pending the completion of an evaluation.

If the manual actions supported by licensee evaluation cannot be accomplished as described in the licensee's procedure(s) treat the finding as a failure to meet the requirements of IIIG2 and follow the guidance in IMC 0609 and IMC 0612.