

From: Eric Weiss, HQ  
To: Charles R. Ogle, R2  
Date: 8/14/02 9:24AM  
Subject: MANUAL ACTIONS SPEACH

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Chuck-

Thank you for the heads up about Shearon Harris that will call HQ to inquire about the need for an exemption. I have attached some slides that I plan to use at the NEI fire Protection Information forum in Seattle August 27-30 for a speech on Manual Actions. I thought this might be useful because slide 5 says succinctly what is a "feasible" manual action.

-Eric

CC: Edward Connell; John Hannon; Phil Qualls

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# NRC Views on Manual Actions

Briefing for the NEI Fire  
Protection Information Forum

Eric Weiss, Chief  
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415-3264

August 29, 2002

# **NRC Letter to NEI**

## **May 16, 2002** (ML021410026)

- Manual Actions are allowed for:
  - ◆ III.G.1 of App R Equipment in separate fire areas
  - ◆ Normally operated manual switches and valves
  - ◆ By exemption or deviation for III.G. 2 of App R
  - ◆ III.G.3 of App R Equipment alternative and dedicated shutdown

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## Appendix R to 10 CFR 50 Section III.G.2

- 3 hour barrier
- 1 hour barrier with suppression and detection
- 20 feet with no intervening combustibles and suppression and detection

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## **NRC/NEI Meeting June 20, 2002**

- NEI contends Manual Actions should be allowed when feasible
- NEI contends that Manual Actions Allowed by reg guidance, safety evaluations, inspections, correspondence and meetings
- NEI presented results of recent survey
- NRC noted that violations should be written when manual actions were not feasible
- NRC does not intend to suspend inspections
- NRC agreed to consider alternatives

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## What NRC Inspectors Look for (When is a Manual Action feasible)

- Procedures and training for manual actions to be performed
- Thermal-hydraulic timeline or other analysis to show that there is adequate time, staffing, and diagnostic instrumentation to perform manual actions
- Acceptable environmental conditions (temp, radiation, lighting, accessibility)

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## Where are we?

- NRC will continue to inspect
- All manual actions must be feasible (in procedures, with supporting analysis, performable)
- Licensees are responsible for safety of their plants
- NRC position in May 16 letter remains unchanged at this time
- NRC is investigating alternatives for permitting feasible manual actions in lieu of current III.G. 2. Provisions- Perhaps rulemaking and Interim Enforcement Policy

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