

From: "EMERSON, Fred" <fae@nei.org>
To: <dx1@nrc.gov>
Date: 10/31/03 1:50PM
Subject: Request for Information on Multiple High Impedance Faults

Dan,

Per discussion with Sunil, I am sending you this anonymous licensee request for information regarding staff policy on multiple high impedance faults. Please provide an approximate time frame for your response.

Thanks,

Fred Emerson
202-739-8086

[illegible]

A utility is now expending resources on the maintenance of a large calculation for multiple high impedance faults (MHIF). This calculation is affected regularly by electrical system changes. In addition, numerous operator actions have been identified to mitigate multiple high impedance faults.

The BWROG proposed the elimination of MHIF (appendix to BWROG Appendix R analysis licensing topical). NRC requested that the BWROG topical be supplemented with NEI PSA guidance in 1999. Ultimately, this resulted in the generation of NEI 00-01 (which includes the proposed elimination of MHIF - appendix B.2). NRC draft inspection guidance eliminates site inspection reviews of the MHIF analysis due to the low probability of the event.

In light of the presently proposed wording of NEI 00-01 and the fact that the MHIF analysis was a commitment to a Generic Letter (86-10), a licensee proposes to eliminate MHIF from its program now using appropriate regulatory analysis (i.e., regulatory commitment change, 10CFR50.59 review, fire protection evaluation using license condition for fire protection, and FSAR changes). Does the NRC staff consider this approach to be premature?

CC: <sdw1@nrc.gov>

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Creation Date: 10/31/03 1:50PM

From: "EMERSON, Fred" <fae@nei.org>

Created By: fae@nei.org

Recipients

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DXF1 (Daniel Frumkin)

SDW1 CC (Sunil Weerakkody)

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MESSAGE 1519 10/31/03 01:50PM

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SDW1 CC (Sunil Weerakkody)

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Files      Size      Date & Time
MESSAGE    1519      10/31/03  01:50PM
Part.001   3141
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Options

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