

ANO Fire Protection Finding Summary

Inspection: Triennial Fire Protection; June 2001

Report: 50-313;368/2001-06; August 20, 2001

Finding: In Fire Zones 98J and 99M of ANO, Unit 1, the licensee failed to ensure that one train of cables, equipment, and components was free of fire damage by one of the three means specified in 10 CFR Part 50, Appendix R, Section III.G.2. In lieu of providing this protection, the licensee credited numerous manual actions for restoring fire-affected safe shutdown functions.

Backfit: ANO claimed the violation was a generic backfit. RIV held 2 backfit panels upholding the violation. NRR addressed the generic aspect of this finding, agreeing with RIV.

At issue: The requirements of 10 CFR Part 50, Appendix R, Section III.G.

III.G.1: fire protection features shall be provided for SSCs important to safe shutdown (SSD), and must be capable of limiting fire damage so that one train of systems necessary to achieve and maintain hot shutdown from either the control room or emergency control station(s) is free of fire damage.

III.G.2: where redundant SSD systems are located in the same fire area, one train of SSD systems (including associated circuits) must be free of fire damage by one of three methods:

- (a) separation by a 3-hr fire barrier;
- (b) separation by a horizontal distance of more than 20 feet with no intervening combustible or fire hazards. In addition, automatic fire detection and suppression system shall be installed; or
- (c) enclosure of one train in a 1-hr fire barrier. In addition, automatic fire detection and suppression system shall be installed.

III.G.3: where protection of SSD functions cannot meet III.G.2, alternative or dedicated shutdown capability must be provided.

ANO: ANO claimed that they are only required to meet Section III.G.1 which permits action at emergency control stations.

Generic: NRC has always permitted the use of manual actions as a method for meeting III.G.2.

Other licensees use manual actions for meeting III.G.2 without prior NRC approval.

R11

Risk:

Phase 2 -

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Phase 3 -

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Differences:

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ANO FP ISSUE TIME LINE

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| June 11 - 22, 2001 | Inspection |
| August 3, 2001 | Exit - issue was characterized as a URI for compliance review and risk significance |
| August 20, 2001 | Report - issue was a URI for compliance review and risk significance |
| August 31, 2001 | Re-Exit - compliance review determined that the use of manual actions for achieving and maintaining hot shutdown conditions was a non-compliance with III.G.2 |
| September 7, 2001 | Phase 2 [REDACTED] S |
| September 10, 2001 | [REDACTED] |
| September 28, 2001 | Backfit - ANO claimed the violation was a backfit generic to all plants |
| October 26, 2001 | Backfit Panel |
| January 11, 2002 | NEI letter to NRR - generic aspect of using manual actions for complying with Appendix R, III.G.2 |
| January 17, 2002 | Backfit Panel - panel denied the backfit, and upheld the violation |
| April 15, 2002 | Backfit Response to ANO - backfit was denied [REDACTED] S |
| May 16, 2002 | NRR letter to NEI - addressing the generic position concerning the use of manual actions for complying with Appendix R, III.G.2. |
| August 20, 2002 | [REDACTED] |
| September 25, 2002 | [REDACTED] S |
| December 10, 2002 | SERP [REDACTED] |
| January 24, 2003 | Re-SERP [REDACTED] |
| March 21, 2003 | IMC 0609.01 Issued - as requested by RIV, this revision permitted the choice letter to characterize the risk [REDACTED] S |
| March 25, 2003 | Choice letter to ANO informing them the finding was GREATER-THAN-GREEN |
| April 2, 2003 | Additional information requested- by ANO to be provided by April 11, 2003 |
| April 11, 2003 | Additional information provided - to ANO via overnight mail |