These are the points ANO made during the public meeting w/ us in Oct

Licensee Point	Our View
In July 1, 1982, the licensee submitted App R compliance review which included a list of 100 zones in full compliance with Appendix R. Included in this list were 14 that credited manual actions for meeting III.G.1. Appendix A of this submittal discussed ASD means, which listed 6 additional fire zones which were not included in the 14.	The licensee's July 1, 1982, submittal did not designate that the manual actions credited for these 14 fire zones were to meet III.G.1. The licensee included these 14 (crediting manual actions) with the other 86 as fire zones in full compliance with Appendix R.
July 2, 1982, Mattson to Vollmer memo endorses the use of manual actions within the context of III.G.1, so these manual actions do not have to be treated under III.G.2 or III.G.3/III.L or receive an exemption request.	The purpose of this memo, as stated in the subject line, was to define a position concerning allowable repairs for ASD and CSD. [redacted]
On August 31, 1982, the NRC met with ANO to discuss the licensee's ASD methodology and requested more information concerning these 14 fire zones with manual actions.	On August 31, 1982, the NRC met with ANO to discuss the licensee's ASD methodology and requested more information concerning these 14 fire zones with manual actions. The meeting notice, the meeting summary (issued September 3, 1982), and the RAI (also issued September 3, 1982) were all written in the context of ASD.
The August 31, 1982 meeting summary dated September 3, 1982, stated that the NRC had requested a written discussion of the licensee's methodology.	Again, the meeting notice, the meeting summary, and the RAI were all written in the context of ASD. In the meeting and in the subsequent RAI, the NRC requested (1) a summary of the licensee's methodology; (2) info on manual actions required to obviate fire effects for the 14 fire zones that meet App R; and (3) info on manual actions required to bring the plant to HSD and CSD by means of ASD independent of the control room. ASD can be a used to achieve HSD (1) from the control room using local manual actions to obviate fire damage or (2) from emergency control stations outside the control room using local manual actions to obviate fire damage. [redacted]

RS

October 5, 1982, the licensee responded to the RAI (9/3/82) providing a summary of their methodology which discussed SSD for III.G.1 and III.G.3 compliance. The licensee stated that manual actions are credited (1) if the component that must be manually operated is not in the fire effected zone, although the cable may be damaged by fire; (2) sufficient time is available; and (3) personnel beyond the fire brigade and minimum shift personnel is available.	The licensee's response to the RAI providing a description of their methodology did not The meeting was held, the meeting summary was written, and the RAI was issued all in the context of ASD. [redacted] addition, neither Fire Zone 98J nor 99M were included in the licensee's list of 14 fire zones that credit manual actions and are in full compliance with APP R. [redacted]
Summary of a March 16, 1983, meeting between Nuclear Utility Fire Protection Group (dated March 28, 1983), indicated that the ASB position (?) on manual action for associated circuits is acceptable.	ANO only provided the cover letter and one page of the summary (issued by NUFPG), which was not in NUDOCS. [redacted] Under the heading of Section A.2.d of Appendix 1 of TI 2515/62, this meeting summary stated that too much time was being spent on chasing control circuits, and that, "In many instances, licensees, with the concurrence of ASB, are taking manual control of pumps at switchgear and motor control centers. ... Also, recognition of the use of manual operation of valves, recognized by ASB, should be embodied in the general guidance given here." The I&E response was stated in the summary as, " I&E will accept the ASB perspectives on this issue."
I&E inspection Manual 2515/62, Rev 1 instructed inspectors to look at both ASD and redundant SSD areas.	ANO only provided 3 pages from TI 2515/62, which directed inspectors to collect information pertaining to fire areas containing redundant SSD equipment and cables.

SECY 83/269, dated July 5, 1983, repeated statements from the July 2, 1982, Mattson to Vollmer memo, that allowed manual actions to comply with III.G.1.	The purpose of the SECY was to provide information to the Commission "... which summarized the licensee's fire protection exemption requests, the staff's disposition of those requests, and generic issue that were raised by the requests. In addition it provides a summary of research results and a discussion of the impact these results have on the staff's view of fire protection requirement, including the need for revision to the present fire protection guidelines." Attachment C to the SECY restates a portion of the Mattson to Vollmer memo. Prior ot the statement, however, the SECY states, " To establish consistency in the plant design, the staff issue the following guidelines concerning repairs (memorandum R. Mattson, to R. Vollmer, dated July 2, 1982)". As stated above, this is only to provide guidance concerning allowable repairs.
GL 83-33	GL 83-33 does not discuss manual actions
	GL 84-09 states that there are 4 alternative that my be implemented outside of primary containment to assure that one redundant train of equipment, cabling, and associated circuits necessary to achieve and maintain hot shutdown remains free of fire damage. The fourth alternative is: installation of alternative or dedicated shutdown capability independent of equipment, cabling, and associated circuits under consideration. The GI further states

Regional workshops April 26, 1984 a workshop was held in RIV	Meeting notice provided interpretation of App R and written responses to industry questions: In response to a question concerning App R violations that have important safety implications, the staff stated that violations are "based on the equipment, components, and systems that are located in the same fire area that are needed for safe shutdown or can adversely affect safe shutdown, and are not protected by the feature of III.G.2, III.G.3 or an approved alternative. In response to a question concerning area or zone concept and the requirement for det'n and suppression, the staff stated, "Section III.G.1 reqluires a performance goal be met regardless of the configuration. Section III.G.2 requires certain separation, suppression and detection requirements where fire areas can be and are designated **which are acceptable without analysis** [emphasis added]. Section III.G.3 requires alternative dedicated shutdown capability for configurations that do not satisfy the requirements of III.G.2 or where fire suppressants released as a result of fire fighting, rupture of the system or inadvertent operation of the system may damage redundant equipment." In response to a question regarding what is alternate shutdown and what is not, the staff stated, "If the system is being used to provide its design function, it generally is considered redundant. If the system is being used in lieu of the preferred system, because the redundant components of the preferred system dot not meet the separation criteria of II.G.2, the system is considered an alternative shutdown capability.

CEB guidance (free of fire damage) for III.G.1 compliance provided in 1984 workshop.	Guidance on free of fire damage (provided in the 1984 workshop) referenced C.1.b BTP 9.5-1. Section C.1.b does not discuss III.G.1. It discusses what the FHA should include. It restates III.G.1, saying that 1 train of equipment necessary to achieve HSD from either the CR or emergency control stations must be maintained free of fire damage by a single fire, including an exposure fire.
April 27, 1984, meeting with ANO summary dated June 5, 1984. In this summary, the NRC stated that ANO's methodology appears to be consistent with staff positions.	Yes, the staff did so state; however the word "appeared" indicates [redacted] as stated in the very next sentence, " It was agreed that the licensee would clearly document the methodology used in its reanalysis and would specifically request our review." In addition in response to Question 2, in which the licensee asked if they should request exemptions as a result of the analysis conducted in response to GL 83-33, the staff responded in the negative, and added, " However, it is recommended that AP&L submit the evaluation which would have been used as a basis for the technical exemption for our review. Furthermore, GL 83-33 does not discuss manual actions.
ANO submitted new criteria for use of manual actions with their August 15, 1984 resubmittal and requested staff review of the revised approach : [within an area]" Where adequate time is available, and the valve is not physically located in the vicinity of the postulated fire, credit is taken for manual operation of manually operable valves." This submittal was updated on August 30, 1985 to supply modification completion status.	[redacted]

	We issued GL 86-10 on April 24, 1986, which said only portions of App R were considered important enough to apply to everyone. Specifically the need to protect safe shutdown and alternate shutdown capability. Also an exemption process is provided for. However, we claimed to be always ready for consultations to provide guidance as to the acceptability of a particular fire protection configuration.
In IP 64700, the NRC recognized manual actions as stated in the inspection of emergency lighting: require illumination to allow manual safe shutdown equipment operation.	Paragraph 2.03 provides inspection guidance on what is required to be illuminated [redacted]