



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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Chief Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
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Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON PROPOSED RULEMAKING -
10 CFR PART 50, APPENDIX R, III.G.2 (VOL. 68 FEDERAL REGISTER 69730,
DATED DECEMBER 15, 2003)

TVA appreciates the opportunity to comment on the subject
rulemaking published in the *Federal Register* (FR) dated
November 26, 2003 (68 FR 66501) and titled "Draft Criteria for
Determining Feasibility of Manual Actions to Achieve Post-Fire
Safe Shutdown." The comment period was extended to January 26,
2004 by the subject FR.

TVA's comments are provided in the enclosure.

If you have any questions, please contact Rob Brown at
(423) 751-7228.

Sincerely,

Mark J. Burzynski
Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission
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ENCLOSURE

COMMENTS ON PROPOSED RULEMAKING 10 CFR PART 50, APPENDIX R, III.G.2 (68 FRN 66501)

Acceptance Criterion	Comments
General Comment	<p>In several places, the guidance states “. . . do not adversely impact . . .” Additional guidance needs to be provided on what constitutes an adverse impact. Since most licensees only indicated that they could achieve shutdown in 8 hours, if they still achieve shutdown in 8 hours, does that constitute compliance?</p> <p>When evaluating access/egress to or through an area, when is it reasonable to allow an operator to pass through or perform a function in a fire affected area? Guidance used in the past has been 60 minutes, unless a detailed analysis is performed and a deviation submitted. It's not clear where that guidance originated.</p>
Staffing and Training	<p>Provisions should be included to include operators in excess of “on-shift” operators, provided an assessment is performed that ensures there is reasonable assurance that other trained individuals, either on-site or in immediate vicinity could respond. This would only be reasonable for actions later into the Appendix R event.</p>
Special Equipment	<p>The criterion “demonstrated to be effective” does not appear to be applicable to such things as keys, self-contained breathing apparatus, and personnel protective equipment.</p>
Demonstration	<p>The term “same personnel/crews who will be required to perform the actions” should be clarified. The validation should be performed by representatives of the Operations organization that have the equivalent training as persons normally expected to perform the required actions.</p>
Complexity and Number	<p>Additional guidance is needed in this area. The current guidance is based solely on a subjective judgment.</p>
Equipment Pre-Conditions	<p>This criterion could be interpreted to imply that a single failure must be postulated. This is not consistent with current guidance contained in Generic Letter 86-10.</p>