

From: "EMERSON, Fred" <fae@nei.org>
To: <sdw1@nrc.gov>
Date: Fri, Dec 3, 2004 9:48 AM
Subject: Circuit Failure Research

Sunil,

You requested my views on the value of the work done by NRC to risk-inform circuit failure issue resolution, specifically the guidance on binning potential circuit failure inspection areas. This guidance was based primarily on the EPRI/NEI circuit failure testing performed several years ago (with NRC participation), and the NRC workshop conducted in February 2003 where potential areas for circuit failure inspection focus were binned, or categorized, by likelihood based on these test results.

In my personal opinion, NRC's performance of this binning process was a useful step toward circuit failure issue resolution. It marked the first significant NRC effort to focus on risk-significant circuit failures and de-emphasize those that are less likely. While I didn't agree entirely with the results of the binning process, the process was generally successful in segregating the likelier failures from those that are not likely and placing those results into the inspection guidance.

This result was useful enough to preclude the need for additional research on the Bin 2 items. Additional research is not necessary for several reasons:

1. There is already enough information from the existing test results to address the areas of uncertainty.
2. Additional research will only prolong the resolution of the circuit failure issue by several years, and even then, the result is likely to be that even more research is needed. This seems to run counter to the Commission direction to close out fire protection issues soon.
3. By the time any additional testing is completed, we will have a year or two of circuit inspections completed using both the RIS 2004-03 inspection guidance and the new SDP. I believe these inspections (of Bin 1 failures) will determine that most are not risk significant. If we learn that Bin 1 items are generally risk insignificant, we could conclude that Bin 2 failures are even less significant without any testing at all. It seems to make sense to allow time to learn from the round of inspections that begin in January 2005 before committing to a research program of uncertain value.

These represent my personal views.

Fred Emerson

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