

From: Dan Livermore *RIV*
To: Phil Qualls *Nff*
Date: 11/8/05 2:38PM
Subject: RIV EB2 Fire Protection Training

Phil,

One item that RIV EB2 would like to discuss during our EB2 training call tomorrow is related to operator manual actions and our current inspection at Wolf Creek.

As for their licensing basis, Wolf Creek relies on an Appendix R comparison table included in their USAR as section 9.5, Appendix E.

One statement from that table is as follows:

Redundant trains of systems required to achieve and maintain hot standby are separated by 3-hour fire rated barriers, or the equivalent provided by III.G.2, or else a diverse means of providing the safe shutdown capability exists and is unaffected by the fire.

Wolf Creek has interpreted "**diverse means**" to include feasible operator manual actions necessary to achieve and maintain post fire safe shutdown.

Because of their interpretation, not many circuits are protected. That is, they rely on an operator action to accomplish a safe shutdown task. For example, a pressurizer PORV and its associated block valve are located in the same fire area and may spuriously open. The licensee requires an operator to open two DC breakers (located two levels beneath the control room) to shut the PORV. This circuit is not otherwise protected. There are many similar manual actions throughout their fire response procedures.

The SER is silent as to the "**diverse means**" statement contained in the Appendix R comparison document. The licensee claims that manual actions are part of their licensing basis due to this comparison document and its diverse means statement. (See the attached procedures for examples of operator actions).

I'm not looking for an answer today, but would like to discuss this tomorrow in our training call.

Thank you.

Dan Livermore

CC: Linda Smith

B-12