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 WEST, K.S.

SUBJECT: Provides comments of list of documents titled, "NRC Generic Fire Protection Communications." Advises that listed documents were not included in NRC fire protection communications.

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March 2, 1999

Mr. K. Steven West, Chief
Fire Protection Engineering Section
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Steve:

Per our discussion, I have reviewed the list of documents titled "NRC Generic Fire Protection Communications". The following comments are provided for your consideration:

(1) Question 8.13 of Generic Letter 86-10 lists "Fire Protection Guidance Issued Since January 1, 1975". It does not appear that all the documents provided by the response to Question 8.13 are included in the list of "NRC Generic Fire Protection Communications."

(2) During the investigation of the D. C. Cook fire protection issues, an attempt was made to assemble all the fire protection documents up until that time frame. A review of those files may identify additional pre-Appendix R documents.

(3) The handouts from the 1984 Fire Protection Workshops do not appear to be included in the list of "NRC Generic Fire Protection Communications." While Generic Letter 86-10 takes precedence over the information distributed during the Workshops, a review of the Workshop information may be helpful in understanding differences of opinion and resolving backfit questions for several issues including circuit analysis issues.

(4) As discussed during last week's meeting, there are documents that do not appear to be included in the scope of the current effort. If the intent of the proposed Regulatory Guide is to summarize all fire protection related guidance and to provide a baseline set of criteria for fire protection, it appears to be in the best interest of both the NRC and the Industry to have all previous guidance and positions evaluated in the development of the proposed Regulatory Guide. Therefore, I urge you to re-evaluate the scope of the current effort.

Based on a cursory review, the following documents do not appear to be included in the list of "NRC Generic Fire Protection Communications."

(1) Memo Fire Protection Policy Steering Committee to Dircks (10/26/84) Recommended Fire Protection Policy and Programs Actions

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- (2) Memo Murley to Martin (6/15/90) Testing of Remote Shutdown Capability
- (3) Memo Parr to Holahan (10/31/84) Information Notice Regarding Isolation Transfer Switches Resulting From Wolf Creek Appendix R Inspection, "Post-Fire Alternate Shutdown Capability"
- (4) Memo Mattson to Eisenhut (12/30/82) Technical Specification on Remote Shutdown Systems
- (5) Memo Lieberman to Taylor (12/1/83) Application of Section III.L of Appendix R to Part 50
- (6) Memo Fioravante to Parr (9/21/81) Summary of Meeting Concerning Appendix R Safe Shutdown Review
- (7) SECY 83-269 (7/5/83)
- (8) Memo Rubenstein to Mattson (3/13/83) Instrumentation for Alternate Shutdown
- (9) Memo Parr to Srinivasan (12/29/83) Unresolved Technical Issue Concerning Alternative Safe Shutdown
- (10) Memo Srinivasan to Parr (6/27/84) Unresolved Technical Issue Concerning Alternative Safe Shutdown
- (11) Memo Vollmer to Eisenhut (12/21/83) Emergency Lighting Requirements
- (12) Memo Virgilio to Wambach (3/10/83) Model Technical Specifications for Alternate Shutdown Systems Required by 10 CFR Part 50 Appendix R
- (13) Memo Mattson to Thompson (1/20/84) NRR Position on Consideration of Remote Shutdown Capability in Detailed Control Room Design Reviews

If you have any question regarding this information, please do not hesitate to call me.

Sincerely



Nicholas E. Fioravante

cc. Fred Emerson, NEI

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