

DEC 24 1985

MEMORANDUM FOR: Brian Sheron, Deputy Director, DSRO
FROM: Daniel R. Muller, Director, BWR PD#2, DBL
SUBJECT: VERMONT YANKEE SALP BOARD MEETING

As you requested in your memorandum dated December 6, 1985, I have examined the generic aspects of the need for the NRC staff to clarify its fire protection position with respect to fuse replacement. The staff's most recent recommendation for clarifying fire protection requirements to licensees has been prepared in the form of a generic letter with an attachment describing staff Appendix R interpretations, and another attachment in the form of a set of questions and answers. This recommended guidance was presented to the Commission on October 3, 1985 (SECY 85-306). The Commission is scheduled to vote on the recommendation in the January 9, 1986 meeting. The process by which the guidance has been developed included regional workshops with industry, soliciting and incorporating industry comments on proposed guidance, regional concurrence, and CRGR review before the EDO proposed the guidance recommendations to the Commission. Commission review was required because, on May 31, 1984, the Commission requested that generic fire protection implementation guidance be submitted for Commission approval before issuance to industry. The issue raised in the Vermont Yankee SALP board meeting, with respect to fuse replacement policy clarification, is not addressed by the proposed generic letter, because the question was not raised by the industry or by any of the NRR or regional staff in the development of the guidance document.

I have talked with those people responsible for promulgating fire protection guidance and they believe that the fuse question addresses an issue below the level of detail that should be promulgated as generic guidance. I agree with them.

In the Vermont Yankee case, the staff requirements have been given verbally to the licensee by the Project Manager. In addition, the licensee, by letter dated October 31, 1985, requested an NRR exemption for fuse replacement as a hot shut down repair. The exemption request will result in plant specific written guidance on this issue being given to Vermont Yankee in this instance. It is expected that the exemption will be granted or denied by April 1, 1985.

Issuance of new generic fire protection guidance requires either: (1) withdrawing the proposed fire protection guidance package currently before the Commission and revising it; or (2) initiating the preparation of a new industry fire protection guidance document for Commission review. For the above

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reasons, I believe that a meeting between Region I and NRR fire protection people to generically clarify the position in question would not be useful.

Consent signed by
Daniel R. Muller

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

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