Moving from Automatic to Manual CO2 Systems

D. M. Frumkin
Fire Protection Engineer

Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

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- NEI White Paper on “Carbon Dioxide Suppression System Design Changes”
  - To NRC: ML050320128 and ML050320130
  - From NRC: ML051740050
- NRC Letter Included seven comments on NEI paper
  1. Enhance manual fire fighting and reduce personnel hazards
  2. Consider physical protection requirements and security orders
  3. Consider Defense-In-Depth for removal of CO_2 systems
  4. Treatment of compensatory measures
  5. Use of Risk-Informed methods
  6. Consideration of “adverse affect”
  7. Reliance on NEI 02-03 for determining “adverse affect”

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- NRC Response to Peach Bottom Request (complete)
  - To NRC: ML032790376 and ML043450196
  - From NRC: ML043070175 and ML051050172
- NRC Response to Salem Request (pending)
  - To NRC: Not Publicly Available
- NRC Response to Millstone Request (pending)
  - To NRC: ML031200705, ML040340468, ML041170398 and ML051750704
  - From NRC: ML042680306

Moving from Automatic to Manual CO_2 Systems

- Methods
  - Deterministic (Salem, Peach Bottom, Millstone)
  - Risk-Informed (Millstone)
- Conclusion
  - Licensees who wish to make design changes to their CO_2 fire suppression systems must evaluate whether prior NRC approval is needed in accordance with their current licensing basis. Potential plant security implications associated with the CO_2 fire suppression systems design changes must be addressed . . . – From NRC response to NEI White Paper