

**Metzger, Brian**

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**From:** Frumkin, Daniel, *DRK*  
**Sent:** Friday, November 26, 2010 8:45 AM  
**To:** Metzger, Brian, *DRK*  
**Subject:** RE: Oyster Creek

Brian,

I can see your issue, I looked through ML100920370 a bit - to try to figure out separation - and in all cases I think there is information, but every case is different.

For CW-FA-14, page 1 of 82 of attachment 2, they refer to RAI 6.1. Basically, instrument air lines run throughout the area, and any IA line that is damaged will necessitate the OMA. So we should talk about the combustibles and suppression (in that case the open nature of the building probably will help). So in this case we couldn't say, 'in the unlikely event of fire damaging both trains.' Rather we would have to just be a little more descriptive of the area, Then we need to go to the March 4th submittal, to get the manual action time. Apparently, all the manual action times are in the March 4th submittal (Phase 2), not in the phase one (3/3) submittal.

And this is how it goes. Some are redundant, and located in the same tray - so that doesn't help much in the "unlikely event" statement. In other cases, there is a single cable in the plant that could be damaged (office building I think), and no other cables were installed.

The single cable example is why these are Phase 1. Their original approved design was to use this cable or a manual action.

So the bottom line, in a lot of cases we won't get to say, that fire damage to redundant trains is unlikely. We may be able to say, a large fire that damages the cable (or air line) is unlikely due to lack of combustibles or fire suppression systems. And there will be a large reliance on the manual action times (from the 3/4/2009) document.

Dan

-----Original Message-----

**From:** Metzger, Brian, *DRK*  
**Sent:** Wednesday, November 24, 2010 2:39 PM  
**To:** Frumkin, Daniel, *DRK*  
**Subject:** Oyster Creek

I am trying to construct an argument for why we feel that a fire is unlikely to damage both trains and actually necessitate the use of the OMAs. The sections that come closest to containing the content I'm searching for appear to be in Attachments 2,5, and 6 of the licensee's RAI responses (ML100920370). Note this document applies to both Phase 1 & 2 so we are only concerned with the Phase 1 OMAs right now. Their Phase 1 incoming request is at ML090630132 and I have attached the draft we got from Ken with Stephanie's revisions/first pass included.

I have also included my working draft in case you need it to see where I am on this stuff. Let me know if you think I am just missing something or if you see a better way to approach it.