

# Moving from Automatic to Manual CO2 Systems

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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 CO2 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

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- Methods
  - Deterministic (Salem, Peach Bottom, Millstone)
  - Risk-Informed (Millstone)
- Conclusion
  - Licensees who wish to make design changes to their CO2 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 CO2 fire suppression systems design changes must be addressed . . . – From NRC response to NEI White Paper