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Sent: February 1, 2020 9:31 PM
To: Consultation (CNSC/CCSN)
Subject: Comments on REGDOC 2.10.2

Gentlemen:

I have the following comments regarding draft REGDOC 2.10.2 which is out for public comments. In Clause A.5, 5th bullet states a requirement on limiting the impacts of spurious operation of fire suppression systems. This Clause is new and not found in REGDOC 2.5.2 Section 7.12 or CSA N293-12. I noted that similar but not identical wording appears in the IAEA Safety Guide No. NS-G-17 Clause 5.13. As a user, I am not sure of the specific requirement. My question is which of the following interpretations is correct?

- 1) In the event of spurious operation of a fire suppression system, discounting safety components, systems or safety groups that are damaged by such action, the remaining safety systems in the plant must be capable of maintaining the essential safety functions, assuming a simultaneous single failure of active components in these remaining systems (i.e. the remaining safety systems must have redundancy).
- 2) In the event of spurious operation of a fire suppression system, discounting safety components, systems or safety groups that are damaged by such action, the remaining safety systems in the plant must be capable of maintaining the essential safety functions, and a simultaneous single failure of active components need not be available (i.e. the remaining safety systems has no more redundancy).

Another question, is the same requirement to be applied to spurious operation of fire alarm systems if such can cause impact to safety systems (e.g. shutdown of HVAC by a false fire alarm could lead to overheating of components) ?

I would appreciate clarification of the above two points.

Steven Lee

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