

Response to Comment - Chapter 7.0 - Fire Safety

Comment No.	Source	Comment	Disposition
7.1	NEI	"...requirement to commit to the requirements of NFPA Standard 801 (and others) be deleted and be replaced by an applicant's commitment to design, implement and maintain fire protection measures consistent with the guidance of appropriate, nationally-accepted, industry standards."	Disagree. NRC policy directs the use of consensus standards where practicable for documents such as the SRP. NFPA provides criteria that is acceptable to the staff, however, alternate criteria can be used if justified.
7.2	NEI	The need to have a Fire Brigade consistent with NFPA 600 cannot be justified, especially if an offsite, professional fire service is relied upon to provide full manual firefighting capability.	Disagree. Applicant may need a fire brigade meeting NFPA 600 criteria if significant fire risks are present. NFPA provides criteria that is acceptable to the staff, however, alternate criteria can be used if justified.
7.3	NEI	Remove the need for a Plant or Fire Safety Review Committee.	Disagree. This is a basic NRC position on fire protection.
7.4	NEI	Remove: "diked areas and run-off water containment is required (§7.4.3.3), even if the ISA does not indicate need for such structures"	Agree in part. This is not a new criteria; NFPA has criteria for the control of contaminated firefighting water. The risks should be identified and if significant, controlled. Applicant may justify not providing such structures on the basis of ISA results.
7.5	NEI	Remove: Physical Security Concerns §7.4.3.3(iii). This addresses protection of workers from the effects of fires - an area not lying within NRC jurisdiction.	Disagree. The NRC is concerned with worker safety as described in the rule; §70.64(a)(6)(ii) pertains to employee evacuation. Physical security for SNM (within NRC regulatory jurisdiction) is actually enhanced by pre-planned and understood worker egress provisions.
7.6	NEI	"Fire Hazards Analysis (§7.4.3.2) should be constrained to radiological safety considerations. To the first sentence of §7.4.3.2 should be added the words "...as related to radiological safety."	Agree. Will also include considerations of hazardous chemicals derived from licensed materials.

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7.7	NEI	Recommend deletion of section 7.4.3.4. It discusses the potential impact on fire safety of hazardous chemicals used at fuel cycle facilities. This section appears to regulate purely chemical hazards and fire hazards that may have no impact on radiological safety.	Agree in part. Will revise this section to limit review to potential impact on radiological safety and hazardous chemicals derived from licensed materials.
7.8	NEI	Change Chapter 7 to address the two elements: "(i) organization of firefighting capability, installation and maintenance of fire protection features and systems (including items relied on for safety), fire training, etc. and (ii) revisions of the facility's ISA pertaining to fire protection resulting from facility and operational changes, improvements in fire protection technology, etc."	Disagree. The comment infers a format based on only two elements. The current format more broadly covers items needed to assure the safety of the worker, the public, and the environment.
7.9	NEI	"The SRP should allow the applicant to commit to performance indicators and not seek specific details as to how compliance with a particular indicator will be achieved."	Disagree. At the September 14 public meeting, in response to NRC staff request for clarification of the meaning of "performance indicators", NEI suggested that this term be considered as meaning "performance requirement." With this substitution, the NEI suggestion is to rely on general commitments to satisfy the performance requirements. The staff needs to reach informed and independent conclusions of the adequacy of the licensee program. The SRP provides the details to conduct a license review and the details needed to assure safety.

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7.10	NEI	The SRP must clearly state that the design of the Fire Protection Program is based upon the results of the ISA. For example, the results of the ISA will determine which areas of the plant require non-aqueous fire suppression systems, which processes require fire detection and alarm systems and what should be the minimum required capabilities of site firefighting forces.	Agree in part. The relationship between the ISA and fire safety will be clearly stated in §7.4.3 and §7.4.3.2. The ISA Summary reports on individual accident sequences, including the likelihood of initiating and subsequent events. The FHA is the fundamental tool for predicting the type and severity of possible fires in a defined facility environment. The ISA team will use the FHA as required input to the ISA process for a facility.
7.11	NEI	Replace §7.1, PURPOSE OF REVIEW with: The purpose of this review is to determine with reasonable assurance that the applicant has designed a facility that provides for adequate protection against fires and explosions that could affect the safety of licensed materials and thus present an increased radiological risk. The review should also establish that the radiological consequences from fires have been considered and that suitable safety controls will be instituted to protect the workers, the public and the environment from them.	Agree with the thrust of proposal. Will recast this text, and will also include considerations of hazardous chemicals produced from licensed materials.
7.12	NEI	Add to §7.1, PURPOSE OF REVIEW: Design of a fire protection program is based upon the results of the Integrated Safety Analysis (ISA). The ISA, as summarized in the ISA Summary, was evaluated in SRP Chapter 3 (<i>'Integrated Safety Analysis (ISA) Commitments and ISA Summary'</i>). The ISA evaluated and ranked the risks posed by potential accident sequences for which fire or explosions could be the initiating event and assessed the adequacy of items relied on for safety (and complementary management measures) to ensure that fires or explosions	Agree in part. See comment 7.10. The section will be revised to more clearly explain the relationship of the FHA to the ISA. The purpose of the Chapter 7 review will be in part to review the applicant's evaluation of fire hazards. Hazard evaluation is a fundamental part of completing an ISA, and the fire protection specialist reviewing Chapter 7 will assist the Chapter 3 ISA reviewer in establishing reasonable assurance that significant fire hazards have been identified and accounted for in the ISA Summary.

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		<p>could not threaten neither the integrity of licensed material nor the health and safety of workers or the public. SRP Chapter 7 encompasses review of the applicant's commitments to design and implement a corporate fire protection program and to examine the applicant's proposed performance indicators. The focus of the review is, therefore, on commitments and performance indicators rather than on specific details on how a commitment or performance indicator will be met.</p>	
7.13	NEI	<p>§7.2 RESPONSIBILITY FOR REVIEW: Keep the Fire Protection Engineer as the primary reviewer, make the Licensing Project Manager the secondary reviewer, and change the rest to supporting reviewers.</p>	<p>Disagree. NRC's position is that the order of responsibility for the technical review is correct as is.</p>

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7.14	NEI	<p>Replace §7.3 AREAS OF REVIEW intro with: 10 CFR 70.62(a) requires a licensee to develop, implement and maintain a safety program that will provide reasonable assurance of public health and safety and of the environment from the fire and explosion hazards of processing licensed material during normal operations, anticipated operational occurrences and credible accidents. The reviewer should first consult the ISA Summary (SRP Chapter 3) to identify those facility operations analyzed in the ISA to have a fire or explosion potential and to gain familiarity with the items relied on for safety (and complementary management measures) that are proposed to prevent or mitigate any resulting chemical or radiological risks. The fire protection program must address these process-specific risks as well as general fire prevention and fire safety management issues. Although a separate fire safety program is not required by 10 CFR 70, an applicant should provide commitments pertaining to fire safety in the following areas:</p>	<p>Agree with some of the proposed change. Since the determination of “reasonable assurance” is one made by the NRC reviewer, it is appropriate to include this term in the SRP. Other changes will incorporate some of this comment material.</p>
7.15	NEI	<p>In §7.3, AREAS OF REVIEW: Replace what general items licensee shall demonstrate with detailed commitments in the following areas: Organization and Conduct of Operations, Fire Protection Features and Systems, ISA and Fire Hazard Analysis, Firefighting Capability</p>	<p>Disagree. The current structure is considered adequate. The detailed commitments acceptable to staff are contained within the Industry Standards referenced with each Section. However, further consideration will be given to including some of the commitments proposed.</p>
7.16	NEI	<p>In §7.4, ACCEPTANCE CRITERIA, delete intro sentence because it is redundant.</p>	<p>Disagree: Needed for section introduction.</p>

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7.17	NEI	<p>Replace §7.4.1, Regulatory Requirements with: 10 CFR 70.62(a) requires an applicant to establish a safety program that will provide for adequate protection against fires and explosions. 10 CFR 70.64 specifies a baseline design criterion for fire protection and requires facilities to be designed on a defense-in-depth basis. 10 CFR 70 provides general performance requirements for the facility.</p>	<p>Disagree: 7.4.1 as currently stated more accurately and comprehensively reflects regulatory requirements.</p>
7.18	NEI	<p>Add the following references to §7.4.2, Regulatory Guidance:</p> <p>Fed. Reg. 57 (No. 154) 35607-35613, "<i>Guidance on Fire Protection for Fuel Cycle Facilities</i>," 1992</p> <p>NFPA Standard 801, "<i>Standards for Facilities Handling Radioactive Material</i>", National Fire Protection Association, Inc.</p>	<p>Agree in part. NFPA 801 will be added, but the branch technical position guidance has been incorporated in the SRP text.</p>

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7.19	NEI	Section 7.4.3, Regulatory Acceptance Criteria, is non-specific and should be re-written. It is not a Chapter 7 task to review the acceptability of the ISA Summary. Replace first two paragraphs with: "An applicant's commitments on fire protection will be considered acceptable if they provide reasonable assurance that the following review criteria are adequately addressed and satisfied. The applicant may incorporate some or all of the requested information by reference to other sections of the application such as the Facility and Process Description (SRP Chapter 1.1) or the ISA Summary (SRP Chapter 3). Either approach is acceptable, so long as the information is adequately cross-referenced."	Agree in part. Section 7.4.3 is an introduction to the specific acceptance criteria in five following subsections. It is the task of the fire protection reviewer to review the ISA Summary to assist the ISA reviewer in certain aspects of the review. See disposition of comment 7.12. This section cross references other SRP Chapters for the fire protection reviewer to review. Consideration will be given to including some of the comment text regarding "reasonable assurance", and incorporating material by reference, in section 7.4.3.
7.20	NEI	Change "Nationally recognized codes and standards are used to assure fire safety." to "Nationally recognized codes and standards may be used to assure fire safety."	Disagree. See comment 7.1. Section 7.4.3 is directed to reviewers - NRC will use the standards to evaluate whether applicants have assured safety. Applicants may propose alternative criteria which NRC will evaluate using the standards to test the proposed alternatives.
7.21	NEI	Add sentence to §7.4.3, third paragraph: "Specified standards will normally be considered as acceptable means of meeting the acceptance criteria."	Agree. Will add the proposed sentence.
7.22	NEI	Change §7.4.3.1 title from: "Fire Safety Management Measures" to "Organization and Conduct of Operations." "...to minimize confusion with the 10 CFR 70.62(d) meaning assigned to the term ' <i>management measures</i> ', NEI recommends that this chapter be renamed ' <i>Organization and Conduct of Operations</i> '"	Disagree. See Comment 7-15. NRC believes the text of 7.4.3.1 clearly differentiates between fire safety management measures and the management measures of Chapter 11 of the SRP.

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7.23	NEI	<p>Replace §7.4.3.1 with: The organization and conduct of operations should be considered acceptable if the following commitments are provided: (1) the applicant commits to establish and maintain an organization responsible for plant fire safety (2) the applicant commits to appoint fire safety personnel and to identify the authority and responsibility of each position (3) the applicant commits to establish organizational relations amongst the individual positions responsible for fire protection and other line managers (e.g. emergency response) (4) the applicant commits to specify minimum experience and qualifications for all positions involved in fire protection functions and activities that affect plant fire safety (5) the applicant commits to develop and implement fire prevention and protection programs and to coordinate their execution with the facility's emergency response plans (6) the applicant commits to provide fire safety training to plant operations and maintenance personnel. The applicant commits to train specialized fire protection and firefighting training (if appropriate) to the facility's emergency response personnel (7) the applicant commits to develop and implement administrative procedures for the management of combustible materials that could initiate accident sequences and impact plant conditions that could affect the safety of radioactive materials, fire prevention and fire protection programs (8) the applicant commits to review, revise and improve, when appropriate, the facility fire prevention and fire protection programs to reflect changes to the ISA, new technologies or new operational</p>	<p>Disagree. The replacement is deficient in the requirement for a review committee, senior level management attention to fire safety, and criteria to base the level of experience and qualification of personnel.</p>

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		<p>procedures (9) the applicant commits to report and investigate fire incidents, to refer them to the facility's corrective action program, and to document corrective actions that are implemented (10) the applicant commits to report to the NRC, in accordance with the requirements of 10 CFR 70.74, any accident or abnormal or safety-significant event resulting from a fire or explosion</p>	
7.24	NEI	<p>Change §7.4.3.2 title from 'Fire Risk Analysis' to 'Fire Hazard Analysis.'</p>	<p>Disagree. See Comment 7-15. This section contains discussion on both fire hazards analysis and ISAs.</p>

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7.25	NEI	<p>The studies and tasks outlined in the following paragraph were conducted as part of the ISA. Fire Hazard Analysis (FHA) need not be considered a separate safety study, but as one component of the ISA process. The paragraph is incorrect in stating that only high-risk accident sequences involving a fire or explosion risk are evaluated. Delete this paragraph as redundant. Replace §7.4.3.2 with: The fire hazard analysis capability should be considered acceptable if the following commitments are provided: (1) the applicant commits to support revision of the facility ISA by conducting analysis of any accident sequences that have fire or explosion risks and to modify, if necessary, items relied on for safety and management measures, (2) the applicant commits to support the facility change process by assessing fire safety impacts of facility and process design modifications that may impact fire safety, (3) the applicant commits to revise plant fire protection measures to incorporate any significant changes or modifications to the facility or processes as a result of revisions to the facility ISA, (4) the applicant commits to review and update, as necessary, the fire analysis capability and to document that fire protection measures are adequate to ensure plant fire safety, (5) the applicant commits to ensure that fire protection measures, items relied on for safety, any safety grading of such items commensurate with fire or explosion risk and management measures continue to be adequate to ensure safe facility operation, (6) the applicant commits to ensure that both the fire protection program and the requirements for</p>	<p>Disagree. Replacement of §7.4.3.2 would eliminate the criteria for conducting FHAs and the interconnection between the ISA and FHA.</p>

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7.26	NEI	<p>Replace the title and first paragraph of §7.4.3.3, Facility Design with: “Fire Protection Features and Systems: An applicant’s commitments to design and construct a facility with adequate fire protection features and systems should be considered acceptable if the following criteria are met: (1) the applicant commits to design new facilities in accordance with the baseline design criteria specified in 10 CFR 70.64(a) and the defense-in-depth requirement of 10 CFR 70.64(b), (2) the applicant commits to design the facility consistent with the guidance provided in NFPA 801 or other appropriate nationally recognized fire codes and standards, (3) the applicant commits to install a fire-alarm system in areas determined in the ISA to have a significant risk of fire or explosion, (4) the applicant commits to incorporate in the facility design an adequate and reliable water supply system, (5) the applicant commits to install in areas of the plant determined in the ISA to have a significant fire loading (or the potential for significant loading) automatic fire suppression systems, (6) the applicant commits to regularly inspect, test and maintain fire protection equipment in accordance with appropriate NFPA or other industry standards, (7) the applicant commits to document in the application the fire safety considerations used in the general facility design of the licensed facilities. Specific issues that should be addressed include: “</p>	<p>Agree in part. Facility design section was a discussion of the fire protection features which limit or prevent fire damage. This includes items such as; building construction, fire areas, electrical installation, life safety, ventilation, drainage, and lightning protection.</p> <p>Since there is no mention elsewhere in the draft SRP, Chapter 7.0 that addressees new facility design and construction requirements. Will add a new paragraph: “<u>Design of New Facilities</u>: New facilities should be designed and constructed in accordance with the baseline design criteria specified in 10 CFR 70.64(a), the defense-in-depth requirements of 10 CFR 70.64(b), and consistent with the guidance provided in NFPA 801 or other appropriate nationally recognized fire protection codes and standards.”</p>

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7.27	NEI	Under Criticality Concerns, change: "An adequate application should address the methodology used for extinguishing fires in water exclusion areas." to "The applicant should address methods for extinguishing fires in water exclusion areas."	Agree in part. Will incorporate wording to the extent that it improves the clarity of this section.
7.28	NEI	Under Criticality Concerns, this sentence is not an Acceptance Criteria and should be deleted: "The staff's fire safety and criticality specialist will review for adequacy."	Disagree. Sentence is needed to indicate who should review.
7.29	NEI	Under Environmental Concerns, change: "Thousands of gallons of fire water can be contaminated with nuclear material during a fire event. Diked areas and drainage of process facilities need to be properly sized to accommodate this run-off. The amount of runoff can be calculated using guidance in NFPA 801. An adequate application documents fire water run-off containment." to "The plant physical design should provide for containment and drainage in areas of the plant where a credible risk of large spills of flammable or combustible liquids exists. The design should also include provision for the drainage and hold-up of contaminated fire water following a fire."	Disagree. The reference to industry standards provide further guidance to the reviewer and is encouraged by NRC policy. See also comment 7.4.
7.30	NEI	Under Environmental Concerns, this sentence is not an Acceptance Criteria and should be deleted: "The staff's fire safety and environmental specialists will review for adequacy."	Disagree. Sentence indicates who should review.

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7.31	NEI	Change the Physical Security Concerns section, from; “Buildings and facilities should be designed to provide safe egress in the event of a fire, chemical, or radiological emergency. Physical security of SNM may inadvertently institute controls that delay worker egress and fire fighter access. Physical security procedures need to allow off-site fire departments quick and efficient access to the fire emergency. NFPA 801 specifies design features acceptable to the NRC and an adequate application documents the criteria used for worker egress and procedures for firefighter access. “ to “Building layout should provide a safe means of egress for plant personnel in the event of a fire. Physical security of SNM may delay worker egress and fire fighter access during fire events. Physical security procedures need to allow off-site fire departments quick and efficient access to the fire emergency.	Disagree. The reference to industry standards provide further guidance to the reviewer and is encouraged by NRC policy. See also comment 7.5.
7.32	NEI	Under Physical Security Concerns, this sentence is not an Acceptance Criteria and should be deleted: “The staff’s fire safety and physical security specialists will review for adequacy.	Disagree. Sentence indicates who should review worker egress and firefighter access concerns.
7.33	NEI	Section 7.4.3.4 appears to regulate purely chemical hazards and fire hazards that may have no impact on radiological safety. Assessment by the NRC of a facility’s fire protection program should be consistent with the 1988 NRC-OSHA MOU – and specifically with clause (iii) that directs NRC review to prevention of fires or explosions the	Disagree. This section follows the intent of the NRC-OSHA MOU and pertains to fire safety of chemicals which could cause, or exacerbate, a fire which, in turn, could cause a release of radiological material.

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		<p>results of which could affect the safety of radioactive materials and thereby present an increased radiation risk. A facility's fire protection program for hazardous chemicals need not be assessed by the NRC. Consideration of the impacts of fires and explosions involving hazardous chemicals, including those produced from radioactive materials, was addressed in the ISA and appropriate safety controls were identified for installation in the plant. Delete this Section.</p>	
7.34	NEI	<p>Replace §7.4.3.5 with: Fire Fighting Capability and Emergency Response</p> <p>The applicant's commitments to establish manual fire fighting capability should be considered acceptable if the following criteria are met: (1) the applicant commits to establish a manual fire fighting capability that is staffed by a well-trained and fully equipped onsite fire emergency response team, by qualified offsite resources, or by a coordinated combination of the two approaches, as is appropriate for the facility, (2) the applicant commits to coordinate and provide liaison with offsite fire fighting resources and to establish a clear line of authority at the fire scene when reliance is placed on offsite response, (3) the applicant commits to enter into a formal agreement (or memorandum of understanding) that documents the assistance to be provided by the offsite organization(s) and that describes the minimum fire fighting manpower and equipment to be provided during fire emergencies and the</p>	<p>Disagree. NRC policy encourages the use of Industry Standards such as NFPA 600, "Industrial Fire Brigades" instead of NRC specific criteria. The criteria suggested by NEI does not provide the details needed to evaluate an application thoroughly.</p>

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		<p>estimated response time, (4) if the facility will rely on offsite fire fighting resources, the applicant commits to undertake periodic training with such offsite fire emergency response team in such areas as facility access, plant layout, emergency egress routes, ventilation systems, fire hydrants, items relied on for safety related to fire prevention, etc., (5) if the facility will rely on manual fire fighting capability provided by onsite fire emergency personnel, the applicant commits to establish, equip and train the personnel to provide the required services, (6) the applicant commits to develop a fire emergency response plan as part of the facility's Emergency Preparedness Plan (SRP Chapter 8) for each area determined in the ISA to be important to plant fire safety. Such plans should identify, for example, access and egress routes, radiological hazards, automatic and manually operated fire suppression measures, locations of items relied on for safety, special procedures for fire</p>	
7.35	NEI	<p>Proposed revisions to this §7.5 are mainly stylistic and are designed to ensure consistency amongst all SRP chapters. Replace §7.5.1 Acceptance Review with: "The primary reviewer should evaluate the application to determine whether it addresses the "Areas of Review" in Section 7.3. If significant deficiencies are identified, the applicant should be requested to submit additional material prior to the start of the safety evaluation.'</p>	<p>Disagree. The proposed change limits the course of action to requesting additional information, and does not address the course of action of returning an application for insufficient information. Will assure consistency with other SRP chapters.</p>
7.36	NEI	<p>Revisions to §7.5 are mainly stylistic and are designed to</p>	<p>Agree in part. Will incorporate wording to the extent that it</p>

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		<p>ensure consistency amongst all SRP chapters. Replace §7.5.2 Safety Evaluation with: “The primary reviewer shall perform a safety evaluation against the Acceptance Criteria in Section 7.4 including the applicant’s commitments to design, implement and maintain each element of the fire protection program. The reviewers may consult with the supporting reviewers and NRC inspection staff to identify and resolve any issues related to the licensing review and to ensure that descriptions in the fire safety section are consistent with descriptions in other sections of the application that may interface with fire safety. Commitments and provisions made in the applicant’s fire safety section should be in accordance with other sections of the SRP. For example, the supporting nuclear criticality safety reviewer should establish that the applicant’s program provides reasonable assurance that a water-based suppression system will not adversely affect criticality safety. The primary reviewer will prepare a Safety Evaluation Report (SER) for the Licensing Project Manager in support of licensing action.”</p>	<p>improves the clarity of this section.</p>
7.37	NEI	<p>Revisions to this §7.6 are mainly stylistic and are designed to ensure consistency amongst all SRP chapters. Replace §7.6 EVALUATION FINDINGS, first two paragraph with: “The staff will write an SER addressing each topic reviewed and explain why the NRC staff has reasonable assurance that the applicant’s facility will be designed and constructed in accordance with appropriate standards and that the fire protection program will be adequate to protect</p>	<p>Agree in part. Will incorporate wording to the extent that it improves the clarity of this section. However, specifics of the fire protection program and references to industry standards in this section will be retained.</p>

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		<p>the health and safety of the workers and public and the environment. License conditions may be proposed to impose requirements where the application is deficient. The following kinds of statements and conclusions will be included in the staff's SER:</p> <p>The applicant has committed to an acceptable Fire Protection Program based upon the results of the ISA and that meets the acceptance criteria of SRP Chapter 7. Fire safety measures address significant fire hazards, suitable fire protection features are proposed as items relied on for safety to control these hazards and the applicant commits to maintain such controls and management measures to ensure the overall adequacy of facility fire safety. In addition, the applicant has provided commitments and information relating to the fire safety organization and conduct of operations, fire protection measures and manual fire fighting capability."</p>	
7.38	NEI	Delete §7.6 EVALUATION FINDINGS, third paragraph.	Disagree. Loss of this paragraph would weaken the SER example due to the loss of detail and the criteria contained within the Industry Standard.

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7.39	NEI	Replace §7.6 EVALUATION FINDINGS, fourth paragraph with: "The staff concludes that the applicant's capabilities meet or exceed the guidance provide in SRP Chapter 7. The staff concludes that the applicant's proposed equipment, facilities and procedures provide a reasonable level of assurance that adequate fire protection will be provided and maintained for those items relied on for safety to meet the safety performance requirements and baseline design criteria of 10 CFR 70."	Agree. Will incorporate the suggested language.
7.40	NEI	Reference 29 CFR 1910 is never cited in SRP Chapter 7. Delete as it is really not applicable to the topic.	Agree.
7.41	NEI	Add to §7.7 REFERENCES: Fed. Reg. 57 (No. 154) 35607-35613, " <i>Guidance on Fire Protection for Fuel Cycle Facilities</i> ," 1992	Disagree. This guidance is being replaced by the SRP for fuel cycle facilities.
7.42	NEI	Add the following to §7.7 REFERENCES: NFPA Standard 801, " <i>Standards for Facilities Handling Radioactive Material</i> ", National Fire Protection Association, Inc.	Agree. This guidance is covered under the NFPA reference; however, the specific NFPA standard addressed in the comment will be added.
7.43	NEI	The reference "Uranium Oxide Fires at Fuel Cycle Facilities" is never cited in SRP Chapter 7. Delete, as it is really not applicable to the topic in Chapter 7.	Disagree. This Information Notice provides lesson learned from a fires at fuel cycle facilities to NRC reviewers. References are not used as acceptance criteria, or even regulatory guidance, but provide background information to reviewers and the industry.

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7.44	NEI	The reference "Evaluation and Reporting of Fires and Unplanned Chemical Reaction Events at Fuel Cycle Facilities" is never cited in SRP Chapter 7. The reporting requirements for the revised 10 CFR 70 differ from those in this Reg. Guide. Consult 10 CFR 70.74].	Agree.