

Comments: Fire Risk Research Plan (11/22/00)

| No. | Source   | Reference        | Comment  | Proposed Resolution/Notes   |
|-----|----------|------------------|--|---|
| 1   | NRR/DSSA | Cover Letter     | Can't concur with final plan "until the plan's tasks are clearly associated with specific NRR user needs."   | NRR to write user need to cover plan.   |
| 2   | NRR/DSSA | Attachment, p. 1 | Modify 3rd para of Executive Summary to change incorrect statement   | Accommodate in final plan   |
| 3   | NRR/DSSA | Attachment, p. 1 | Modify Executive Summary to address broader fire protection issues at nuclear facilities than just "fire risk."  | Accommodate in final plan. Will need to address in NRR User Need also.  |
| 4   | NRR/DSSA | Attachment, p. 1 | Modify Table E1 to add task (Task 10) on circuit analysis  | Circuit analysis is currently in Task 1. Can modify Task 6 to include additional activities.  |
| 5   | NRR/DSSA | Attachment, p. 1 | Modify Table E2 to add milestone for fire model validation   | Can't complete in FY 2001-2002.   |
| 6   | NRR/DSSA | Attachment, p. 1 | Modify Section 1.2.1 to include conduits with cable trays  | Accommodate in final plan   |
| 7   | NRR/DSSA | Attachment, p. 1 | Add additional high priority task on "insights regarding the applicability of IPEEE methods, tools, and data in NRC regional and headquarters staff current routine activities." | The fire risk requantification study and the IPEEE review program will provide valuable insights on the IPEEEs. A comprehensive review will benefit from an application of advanced methods. Provide more details on IPEEE program output in Section 1.4.1, include specific references to IPEEEs in Task 2; mention possible additional work in Section 5. |
| 8   | NRR/DSSA | Attachment, p. 1 | Modify Section 1.2.4 to delete schedule for rulemaking. Also Table 3, dates for Task 5.  | Accommodate in final plan   |
| 9   | NRR/DSSA | Attachment, p. 1 | Modify Section 1.4.1 to mention OERAB effort on performance indicators   | Accommodate in final plan   |
| 10  | NRR/DSSA | Attachment, p. 2 | Modify Section 1.4.1 to reflect FPRCC responsibilities   | Accommodate in final plan. Note that one committee activity is "Support the implementation of research results into these [rulemaking, licensing, and inspection] activities."  |
| 11  | NRR/DSSA | Attachment, p. 2 | Modify 4th bullet, Section 3.2.1 regarding "fire effects containment"  | Accommodate in final plan - refer to fire barrier reliability and effectiveness.  |
| 12  | NRR/DSSA | Attachment, p. 2 | Modify 5th bullet, Section 3.2.1. Revise fire protection systems reliability subtask to include estimation of effectiveness.   | Accommodate in final plan (details to this effect are provided in Section 3.2.2).   |
| 13  | NRR/DSSA | Attachment, p. 2 | Modify 8th bullet, Section 3.2.1. Drop fire barrier penetration seal effort.   | Can do this in final plan - objective and activity were in previous plan.   |

Attachment 3

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| 14  | NRR/DSSA | Attachment, p. 2   | Modify Section 3.2.2. Task should include detection system effectiveness and unavailability.   | Tools for evaluating effectiveness will be developed under Task 6. Can add work on unavailability in FY 2002.                   |
| 15  | NRR/DSSA | Attachment, p. 2   | Modify Section 3.4.4. Include additional models in Task 3 (see NFPA 805 Appendix B).   | Accommodate in final plan - resources are limited. Could use help with prioritization.  |
| 16  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.7. Merge NPP and GDP fire protection tasks into one task.   | Keep separate - helps with administration, budget.  |
| 17  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.7.1. Add evaluation of existing models as 2nd bullet.   | Accommodate in final plan   |
| 18  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.8.1. Modify text to include flammable gases.  | Could accommodate in final plan. NMSS concur? (This was not the focus of previous discussions.)                                 |
| 19  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.8.2. Modify text to include "ignition temperature" after "fire point".  | Accommodate in final plan   |
| 20  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.9.1. Delete bullet regarding SDP review.  | Accommodate in final plan   |
| 21  | NRR/DSSA | Attachment, p. 3   | Modify Section 3.9.4. Modify review date completion to October 2001. Include periodic briefings and draft recommendations.   | Accommodate in final plan   |
| 22  | NRR/DSSA | Attachment, p. 3   | Modify Section 5. Modify discussion of potential future work to include fire brigade performance and effectiveness, operator performance during fires, potential for non-core damage radiological hazards. | Accommodate in final plan   |
| 23  | NRR/DSSA | Attachment, p. 4   | Modify Appendix B. Expand discussions to include prioritization process.   | Modify Appendix B either to state that prioritization process was described in first plan, or to reiterate original discussion. |
| 24  | NRR/DSSA | Attachment, p. 4   | Include OERAB effort on fire and smoke events database as part of plan.  | Will update Section 1.4.1.  |
| 25  | NMSS/SPB | Steele email, p. 2 | Make Task 1 more specific (to specifically focus on electronic components) or broaden to include other fire effects (e.g., radiative heat)   | Discuss with NMSS   |
| 26  | NMSS/SPB | Steele email, p. 2 | Delete 4th objective of Task 1 (regarding probability of fire)   | Discuss with NMSS   |
| 27  | NMSS/SPB | Steele email, p. 2 | Use other models (in addition to network model); make data available.  | Discuss with NMSS   |
| 28  | NMSS/SPB | Steele email, p. 2 | Use large-scale over small-scale experiments.  | Discuss with NMSS   |

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| 29  | NMSS/SPB  | Steele email, p. 2   | Develop a risk assessment framework.                                    | Discuss with NMSS   |
| 30  | NMSS/SPB  | Steele email, p. 2   | Develop guidance on estimating uncertainty bounds.                      | Tools have been developed in previous work. Task 3 is providing some data and evaluation. Task 2 will apply available knowledge. Task 4 will develop guidance based on lessons learned from applications. |
| 31  | NMSS/SPB  | Steele email, p. 2   | Quantify risk for hypothetical cases to avoid risk to NRC.              | Discuss with NMSS   |
| 32  | NMSS/SPB  | Steele email, p. 2   | Fix possible conflicts between Tasks 2 and 3.                           | Accommodate in final plan. Note that Task 3 will probably go beyond FY 2002.  |
| 33  | NMSS/SPB  | Steele email, p. 2   | Provide a detailed table with all milestones.                           | Provided in Table 3   |
| 34  | NMSS/SPB  | Steele email, p. 3   | Concerned about motivation of developers to improve models.             |   |
| 35  | NMSS/DWM  | McCartin email, p. 1 | No comments, but want to be on distribution for products.               | Will do   |
| 36  | NMSS/MNS  | Cox email            | No comments   |   |
| 37  | NMSS/SFPO | Guttman email        | No comments   |   |
| 38  | RES/DET   | Draft comments       | Include aging effects on electrical equipment                           | Discuss with RES/DET - issue may be addressed under separate cable work   |
| 39  | RES/DET   | Draft comments       | Provide clearer definition of success                                   | Difficult to do for PRA modeling  |
| 40  | RES/DET   | Draft comments       | Provide information on resources  | Address in separate document  |
| 41  | RES/DET   | Draft comments       | Investigate risk implications of electronic component exposure to smoke | Address in Section 5  |