

**Risk-Informed, Performance-Based
Fire Protection Rulemaking:
Industry Views**

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Meeting Objectives

- Address policy issues
- Address implementation issues



Policy Issues

- Questions
 - Does the Commission support risk-informed fire protection rulemaking?
 - Is NFPA 805, in its current form, the vehicle to achieve a risk-informed fire protection rule?
 - If not, what changes (or exceptions) to NFPA 805 are necessary?



Policy Issues

- Questions
 - What are NRC goals for this rulemaking?
 - Are there major concerns for moving forward?
 - Have all issues been identified (NRC and industry)?



Policy Issues

- Questions
 - What is the staff response to the 3 exceptions proposed by industry for inclusion in the language of the rule?
 - Application is optional by any licensee
 - Section 2.4.2 must maintain wording allowing other risk-informed, performance-based methods
 - Section 3-1 must be revised



Necessary Exception

- Exception to Section 3-1 to read:

“General: This chapter contains the fundamental elements of the fire protection program and specifies the minimum design requirements for fire protection systems and features. Performance-based approaches acceptable to the NRC may be applied to the fire protection program elements and minimum design requirements in this chapter. Fire protection elements described in the existing licensing basis take precedence over the requirements contained herein. If previously approved licensing bases do not address specific fire protection program elements and design requirements in this chapter, performance-based approaches may be applied to these elements and requirements as described above.”



Policy Issues

- Questions
 - Is NEI/industry prepared to devote resources?
 - Will NEI prepare the guidance document?
 - What priority schedule is desired by all?



Implementation Issues

- Important to understand all issues affecting implementation
 - NRC issues
 - Industry issues
- Discussion of NRC concerns for NFPA 805 implementation
 - Enclosure 1 to April 6 letter to NEI (3 issues)
 - Others?



Implementation Issues

- Industry issues
 - Presented in March 23 letter to NRC
 - Discussion/questions from NRC staff



Implementation Issues

- Development of industry guidance and regulatory guide
- The process for AHJ approvals
- How 805 tools can be used in the current licensing basis
- How 805 tools can be used to address new regulatory issues
- How other NRC concerns about 805 document will be addressed


