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

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Meeting Objectives

- Review meeting context
- Address policy and process issues

Meeting Context

- Industry concerns expressed to Commission
- Industry agreed to meet with staff to work out exceptions to NFPA 805 that would allow industry to support rulemaking

Meeting Context

- Industry recommendations are intended to remove unnecessary licensee burdens and barriers to implementation
  - Industry proposed 3 exceptions to be reflected in the rule language
    - Barriers to implementation also identified
  - Concerns over proposed language for an exception to Chapter 3 deferred to this meeting
  - Process issues also deferred

Issues To Be Addressed

- Policy
  - Language for exception to NFPA 805 Section 3-1
- Process
  - Significant process issues
  - Other process issues

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* ***docketed*** *licensing basis* take precedence over the requirements contained herein. *If* ***docketed*** *[delete "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.*"

Necessary Exception

- Rationale for Section 3-1 proposal
  - Allow use of P/B methods in Chapter 3
    - Methods must be acceptable to NRC
  - Previously docketed elements of licensing basis take precedence over Chapter 3 provisions
    - Docketed information reviewable by NRC
  - Allow P/B methods for areas required to be addressed in Chapter 3 but not addressed in current licensing basis

Principal Process Issue

- Addressing proposed licensee changes or exceptions through use of NFPA committee and Tentative Interim Amendments

Other Process Issues

- Content of one-time submittals required for plant transition to 805 basis; NRC approval
  - Acceptance of specific P/B methods
  - Exceptions to 805
  - Equivalency evaluations
  - Documentation requirements
  - SERs or other approvals

Other Process Issues

- Follow-on submittals
  - Submittals needed
  - Plant changes without submittals
- Adoption of subsequent revisions to NFPA 805
- Use of PRA methods
  - Acceptable for submitted exceptions
  - Acceptable for equivalency evaluations

Implementation Issues

- Development of industry guidance and regulatory guide
- How 805 tools can be used in the current licensing basis
- How 805 tools can be used to address new regulatory issues