January 23, 2002

MEMORANDUM TO: Cynthia Carpenter, Program Director
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA/**
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF JANUARY 16, 2002, MEETING WITH NUCLEAR ENERGY INSTITUTE ON IMPLEMENTING GUIDANCE FOR NFPA 805

On January 16, 2002, Nuclear Regulatory Commission (NRC) staff met with representatives of the Nuclear Energy Institute (NEI) and industry to discuss NEI's proposed outline of guidance for implementation of National Fire Protection Association (NFPA) standard NFPA 805, "Standard on Performance-Based Fire Protection for Light Water Reactor Electric Generation Plants." The meeting attendees are listed in Attachment 1. Presentation material from NEI is in Attachment 2.

After introductions were made, Eric Weiss, of the NRC, stated that the NRC was interested in hearing the quality assurance (QA) portion of the outline and that the NRC was focused on achieving implementing guidance that was comprehensive and beneficial to both the regulator and to licensees. Leon Whitney, of the NRC, stated that although licensees have existing QA provisions for their facilities, it would not be appropriate for the implementing guidance to be silent regarding QA provisions.

Fred Emerson, of NEI, agreed that it would not be appropriate for the guidance to be silent but that it also would not be useful for the guidance to be excessively detailed given that plants have existing QA programs. He then distributed the slides for his presentation (Attachment 2).

The topics discussed in the presentation were:

- Quality Assurance (QA)
- Configuration management
- Change control process
- Records retention
- Status of NEI 00-01
- Topics for meetings on February 12, and February 26, 2002

Regarding Quality Assurance, NEI noted that existing plant programs cover QA and that there is an ASME standard on probabilistic safety assessments (PSA). A standard on PSA is being developed by the American Nuclear Society but would not be ready in time to be useful for this guidance. The NRC staff observed that the use of existing programs was appropriate but that actions on fire protection should have a fire protection engineer as the lead.

Regarding records retention, the group discussed that the records of the transition process should be sufficient such that the process would be understandable by a later review. Records of the fire protection program should be available in one location.

Change control for fire protection was discussed at some length because currently not all licensees have the same change control process and there may be confusion as to what is required. Some licensees may have an existing change control process that is similar to 50.59 whereas others may be governed by standard license conditions and need to seek a license amendment to make minor changes to the fire protection program. NEI commented that a change control document should be developed by NEI in time for review of the NEI guidance.

NEI and the staff also discussed NEI's document NEI 00-01 on circuit failure analysis. The staff stated that it expects to have many questions on NEI 00-01. NEI believes that the staff's issues can be resolved and NEI 00-01 endorsed by the NRC. Both NEI and NRC agreed that the circuit analysis methodology was important and would be beneficial to licensees to use in conjunction with NFPA 805.

NEI commented that it was preparing a written response to the NRC's January 7, 2002, letter that commented on the draft implementing guidance. The staff and NEI agreed to discuss NEI's responses to the letter during a February 26, 2002, meeting. The staff and NEI plan to hold a meeting February 12, 2002 to discuss aspects of the transition process including how current plant conditions different from the deterministic requirements delineated in Chapter 3 of NFPA 805 should be fit into the fire protection program when a licensee adopts NFPA 805.

Having completed discussion of the agenda items, the group adjourned.

Project No. 689
Attachments: As stated
cc w/atts: See list

Attendees for January 16, 2002
Meeting on NFPA 805 Implementing Guidance

NAME	ORGANIZATION
A. Marion	NEI
F. Emerson	NEI
C. Sinopoli	Exelon-Peach Bottom
D. Ferraro	Winston &Strawn
T. Furlong	Nuclear Services Organization
D. Raleigh	Scientech LIS
S. Black	NRC/NRR/DSSA
E. Weiss	NRC/NRR/DSSA/SPLB
L. Whitney	NRC/NRR/DSSA/SPLB
J. Birmingham	NRC/NRR/DRIP/RGEB
S. Wong	NRC/NRR/DSSA/SPSB

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*See previous concurrence
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