

**Risk-Informed, Performance-Based Fire Protection
Implementing Guidance**

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NRC Issues/Comments

- QA
- Configuration management
- Change control process
- Records retention
- Status of NEI 00-01
- Topics for meetings on February 12 and February 26



Overview

- Existing plant programs cover QA, configuration management, change control, records retention
 - Take advantage of existing programs
 - Easier transition
 - More effective implementation
 - Minimize changes to existing programs



QA Guidance

- Current QA programs adequate for RI/PB fire protection
 - FP design, procurement, installation and modifications will continue to be managed under the fire protection QA program
- Personnel qualification
 - Can add fire modeling and perhaps fire PSA to areas that are already covered under existing qualification programs



Configuration Management Guidance

- Manage configurations of PSA, FHA, SSA, and pertinent calculations
 - First screen documents to determine need to update (guidance to include screening criteria)
 - Periodically address cumulative effect of changes (guidance to include criteria to determine periodicity)
 - Address 805 provisions for configuration management and monitoring



Records Retention Guidance

- Implement existing ANSI N45.2.9 or equivalent requirements
 - Few if any changes needed



Topics for Future Meetings

- 02-12-02
 - Use of 805 tools in current licensing basis
 - NRC approval for use of 805 appendix material
 - Section 3.1 issues
 - Fundamental program elements
 - Docketed licensing basis material
 - Meeting Chapter 1 performance requirements
- 02-26-02
 - To be defined



NEI 00-01

- 805 provides one method for addressing circuit failure issues
 - Allows use of other methods
- NEI 00-01 considered to be the primary method for circuit failure issue resolution
 - NRC approval expected after review and comment period
 - Use should be addressed in implementing guidance



Change Control Guidance

- Station mod process requires review of licensing basis for each proposed change
- Implementing guidance should reflect current status of change control guidance being prepared to replace or supplement 50.59 and GL 86-10


