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DOCKETED
USNRC

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March 4, 2002 (11:18AM)

January 16, 2002

DOCKET NUMBER
PROPOSED RULE **PR 50**
(66FR 65661)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff,
Mail Stop O-16C1

RE: Rulemaking to amend Title 10 of the Code of Federal Regulations (10 CFR) part 50.48, "Fire Protection," to endorse the National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants 2001 Edition, published in the *Federal Register* December 20, 2001.

Dear Sirs:

On behalf of NFPA (the National Fire Protection Association), I am responding to the Nuclear Regulatory Commission (NRC) proposed rulemaking to amend Title 10 of the of Federal Regulations (10 CFR) part 50.48, Fire Protection, to endorse the NFPA International, NFPA 805, *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants*, 2001 Edition. The NFPA fully endorses the adoption and use of this standard by the NRC in their rulemaking. The NRC participated in the development of NFPA 805 along with representatives from industry, and NEI, manufacturers, insurance, special experts and other government regulators.

As a voluntary consensus standards development organization, NFPA is pleased to have had NRC representation and participation in the development of NFPA 805. We are encouraged that the NRC proposed adoption of NFPA 805 is in accordance with Public Law 104-113, "The National Technology Transfer and Advancement Act of 1995", which directs all federal agencies and departments to use technical standards that are developed or adopted by voluntary consensus standards bodies, using such technical standards as a means to carry out policy objectives or activities.

The NFPA is an International, non-profit Association, which develops consensus codes and standards, that are accredited by the American National Standards Institute (ANSI) as American National Standards.

Thank you for this opportunity to submit comments on this proposed rulemaking.

Sincerely,

John C. Biechman
Vice President
Government Affairs

Template = SECY-067 Washington Office

SECY-02