

May 16, 2002

MEMORANDUM TO: Dr. George E. Apostolakis, Chairman
Advisory Committee on Reactor Safeguards

FROM: Suzanne C. Black, Deputy Director/**RA**
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

SUBJECT: PROPOSED REVISION OF 10 CFR 50.48 TO PERMIT VOLUNTARY
ADOPTION OF NATIONAL FIRE PROTECTION ASSOCIATION (NFPA)
STANDARD 805

On June 4, 2002, my staff will brief the ACRS Fire Protection Subcommittee on the proposed revision of 10 CFR 50.48 to permit voluntary adoption of National Fire Protection Association (NFPA) Standard 805, "PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION FOR LIGHT WATER REACTOR ELECTRIC GENERATING PLANTS, 2001 EDITION" (NFPA 805) as an alternative set of risk-informed, performance-based fire protection requirements for light water reactors. On June 7 we will brief the full ACRS on this subject.

We wish to assure the ACRS that during this rulemaking we have been responsive to the concerns raised in the ACRS letter to the Chairman of the NRC dated February 18, 1999. In that letter the ACRS criticized NFPA 805 by saying "Risk assessment is not allowed by the standard to alter the basic fire protection requirements. Indeed, it is not readily apparent that risk analysis is considered as a means for justifying reductions in the additional performance-based fire protection requirements." The ACRS went on to say that NFPA 805 was not "a bold step in the direction of risk-informed performance-based fire protection."

The proposed rule, if issued, would allow the use of risk-informed and performance-based approaches to make the regulatory process more efficient and effective. In combination with on-going methods development and planned standards activities, the proposed rule can make a significant contribution in this area. In addition, although we recognize that the proposed rule by itself is not a "bold step," it is an essential first step in integrating risk insights and the advances in fire science that have occurred since issuance of Appendix R over twenty years ago.

We look forward to providing more information to the ACRS on the details of this rulemaking at the forthcoming meetings.

cc: Stephen L. Rosen

Contact: Eric Weiss, SPLB/DSSA/NRR
301-415-3264

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