

July 3, 2002

MEMORANDUM TO: William D. Travers  
Executive Director for Operations

FROM: Charles E. Ader, Chairman **/RA/**  
Committee To Review Generic Requirements

SUBJECT: MINUTES OF THE COMMITTEE TO REVIEW GENERIC  
REQUIREMENTS MEETING NUMBER 373

The Committee To Review Generic Requirements (CRGR) held special Meeting No. 373 on June 11, 2002, from 10:00 A.M. to 12:00 P.M., with the attendees listed in Attachment 1. The purpose of this meeting was to review the proposed rule: Revision of 10 CFR 50.48 (Accession No. ML021270204) to permit light-water reactors to voluntarily adopt National Fire Protection Association (NFPA) Standard 805.

The staff provided the CRGR information related to the rule. The CRGR asked questions to assure the members that the rule was voluntary and that it did not contain any backfit issues. CRGR also requested the opportunity to review the Temporary Instructions (TI) before it is issued.

Mr. Eric Weiss, Office of Nuclear Reactor Regulation (NRR), briefed the CRGR on the proposed rule to revise 10 CFR 50.48 to permit light-water reactors to voluntarily adopt NFPA 805. The slides for Mr. Weiss' presentation can be found in ADAMS, Accession No. ML021620040.

One of the questions asked by CRGR was, how would the inspectors know when to apply NFPA 805 or not, within the TI. The response was that the Rule 50.48(c)(3) referring to compliance with NFPA 805, requires that the licensee complete the implementation of the methodology of Chapter 2 of the NFPA 805. Upon completion, the licensee is to modify the fire protection plan required in 50.48(a) to reflect the licensee's decision to comply with NFPA 805 before changing its fire protection program to what is permitted in NFPA 805. The plan can then be used by an inspector to verify which fire protection requirements the licensee is under.

A question was asked concerning the application of the Regulatory Guide 1.174 criteria to incremental changes such that the risk is not permitted to reach unacceptable values. The response was that the Regulatory Guide 1.174 criteria are incorporated in NFPA 805 and that there is also a provision within NFPA 805 against cumulative risk increase.

Also, the question was raised as to how the licensee under NFPA 805 could continue using existing exemptions for alternatives that were granted while under Appendix R. The response was that the Licensee would be allowed to carry exemptions forward into NFPA 805. The deterministic process requires the licensing basis to go through various safety criteria to insure that they are adequate when using the deterministic approach of NFPA 805. However, under

the performance-based approach of NFPA 805 the licensee would have to evaluate each exemption based on the performance criteria of NFPA 805. If the exemption performs according to the NFPA 805 performance criteria then the exemption would be grandfathered into NFPA 805.

The CRGR also discussed that guidance via a Regulatory Guidance/Nuclear Energy Institute (NEI) implementation guidelines need to be developed to support an effective implementation of the rule.

Questions about these meeting minutes should be referred to Les Cupidon at LRC@nrc.gov.

Attachments: As stated

C:\ORPCheckout\FileNET\ML021840715.wpd

PACKAGE: ML 021840244  
 OAR in ADAMS? (Y or N) Y ADAMS ACCESSION NO.: ML021840715 TEMPLATE NO. NRC-001  
 Publicly Available? (Y or N) Y DATE OF RELEASE TO PUBLIC N/a SENSITIVE? N

\* Previously concurred.

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure  
 "N" = No copy

OFFICE	CRGR		CRGR					
NAME	L. Cupidon*		C. Ader					
DATE	7/02/02		7/3/02		/ /02		/ /02	

(RES File Code) RES \_\_\_\_\_

MEMO DATED: 7/3/02

SUBJECT: MINUTES FOR THE COMMITTEE TO REVIEW GENERIC REQUIREMENTS  
MEETING NUMBER 373

cc w/atts:	<u>Mail Stop</u>
Chairman Meserve	O-16 C1
Commissioner Dicus	O-16 C1
Commissioner Diaz	O-16 C1
Commissioner McGaffigan	O-16 C1
Commissioner Merrifield	O-16 C1
Annette Vietti-Cook, Secretary of the Commission	O-16 C1
William D. Travers, EDO	O-16 E15
William F. Kane, DEDR	O-16 E15
Carl J. Paperiello, DEDMRS	O-16 E15
Frank J. Congel, OE	O-14 E1
Hubert T. Bell, OIG	T-5 D28
Karen D. Cyr, OGC	O-15 D21
Janice E. Moore, OGC	O-15 D21
John T. Larkins, ACRS	T-2 E26
Martin J. Virgilio, NMSS	T-8 A23
Margaret V. Federline, NMSS	T-8 A23
E. William Brach, NMSS	O-13 D13
Samuel J. Collins, NRR	O-5 E7
Ashok C. Thadani, RES	T-10 F12
R. William Borchardt, NRR	O-5 E7
Jon R. Johnson, NRR	O-5 E7
Leon Whitney, NRR/DSSA/SPLB	O-11A11
Gary Holahan, NRR/DSSA	O-10 A1
Eric Weiss, NRR/DSSA/SPLB	O-11 A11
John Hannon, NRR/DSSA/SPLB	O-11 A11
Joe Birmingham, NRR/DRIP/RGEB	O-11 F-1
Mark Salley, NRR/DSSA/SPLB	O-11 A11
Peter Wen, NRR/DRIP/RGEB	O-11F11

**CRGR MEETING No. 373**  
**LIST OF ATTENDEES**  
**(June 11, 2002)**

**CRGR Members**

Charles E. Ader, Chairman  
Charles A. Casto, NRR  
Margaret V. Federline, NMSS  
Janice E. Moore, OGC  
Jack R. Strosnider, RES  
Bruce S. Mallett, RII

Les Cupidon, CRGR Staff

**NRR Staff**

Suzanne C. Black, NRR/DSSA  
John N. Hannon, NRR/DSSA/SPLB  
Eric W. Weiss, NRR/DSSA/SPLB  
Edward A. Connell, NRR/DSSA/SPLB  
Leon E. Whitney, NRR/DSSA/SPLB  
Joseph L. Birmingham, NRR/DSSA/RGEB