

January 27, 2003

NOTE TO: FILE

FROM: Eileen McKenna, Policy and Rulemaking Program, NRR /RA/

SUBJECT: RECORD OF TELEPHONE CALL WITH NUCLEAR ENERGY INSTITUTE

On January 27, 2003, two members of the NRC staff (Eileen McKenna and Dan Frumkin) had a telephone discussion with Fred Emerson of the Nuclear Energy Institute (NEI) to provide preliminary staff comments on an NEI document, NEI 02-03, "Fire Protection Program Change Guide." The document would provide guidance for licensee review of proposed changes to their fire protection programs as to whether they require prior NRC approval, in accordance with the provision of the license condition as contained in Generic Letter 86-10. In a letter dated December 4, 2002, (ML023520058), NEI had requested comments from the NRC on this document.

The NRC provided a number of clarifications or suggested revisions to the document. As an example of the clarifications, NRC noted that section 4.2 (discussing use of a current code vs. a "code of record") would be improved by discussing the extent of use of the code (e.g., entire code vs. parts). Another suggestion was that where the guide provides examples of changes that would screen out from further licensee evaluation, additional wording as to the reason why each example screened would be helpful. NRC also suggested further information that might be included in future GL 86-10 fire protection evaluations (in the Attachment to Appendix 1). Also, in light of current status with respect to manual actions for purposes of meeting Section III.G.2, NRC stated that the proposed screening example on this subject should be clarified or deleted.

Mr. Emerson stated that he would discuss these comments with the NEI task force that prepared the document (along with other comments provided by licensees who were also reviewing the draft), and would then provide a revised draft of the guidance to the staff. The staff stated that it plans to write a letter back to NEI with any remaining comments, or with a statement that we have no more comments. The staff does not plan to "approve" the use of this document.

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