



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ENCLOSURE 7

SEP 21 1984

MEMORANDUM FOR: Harold R. Denton, Director, ONRR
Richard C. DeYoung, Director, IE

FROM: Richard H. Vollmer, Chairman
Fire Protection Policy Steering Committee

SUBJECT: FIRST MEETING OF FIRE PROTECTION POLICY STEERING
COMMITTEE

Summary

At its first meeting, the Fire Protection Policy Steering Committee (SC) discussed the issues identified in the EDO memo of September 13, 1984. The SC made the following recommendations and assignments:

- the SC recommended that Appendix R implementation policy follow the "Interpretations" discussed at the Regional Workshops, as modified by details discussed below, rather than requiring prior staff review or exemptions for deviations from Generic Letter 83-33;
- the SC recommended that the issuance of the fire protection enforcement policy and enforcement actions be expedited;
- the SC recommended that QA for fire protection be clearly defined as that required by GDC-1; and
- the SC assigned to the Working Group tasks dealing with the adequacy of available guidance, comparison of fire protection requirements for ORs and NTOLs, the adequacy of current inspection practices, and identification of outstanding technical issues.

Introduction

As a result of the EDO memo of September 13, 1984, regarding a review of NRC fire protection policy and programs, the SC held its first meeting* on September 13 and 14. The objectives of this meeting were to:

*Attended by: T. Martin, J. Olshinski, L. Spessard, N. Grace, F. Rosa, S. Richardson, W. Shields, W. Little, T. Wambach, W. Olmstead, K. Cyr and R. Vollmer.

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Enclosure to GL 85-01, Re: Fire Protection Policy

- discuss the background leading to the formation of the SC;
- establish a general charter, objectives, schedule, and working arrangements; and
- discuss issues currently in hand and make decisions for resolution if appropriate.

The discussion of background included the events leading up to and including the fire protection regional workshops, the May 30, 1984 meeting with the Commission, the August 27 meeting with the EDO, and the events surrounding the DPO signed by three fire protection reviewers and two inspectors. As part of this background, ELD representatives discussed the Rule and the distinction between its legally enforceable requirements and staff guidance issued subsequent to the Rule. The background discussion also focussed on the issues identified in the EDO memo of September 13.

Charter and Schedule

The charter of the SC is the review of NRC fire protection policy and programs leading to policy recommendations which would expedite compliance with Appendix R at older plants and assure consistent levels of fire protection safety at all plants. To implement this Charter the SC agreed that current licensing, inspection, legal, and technical issues needed to be examined. The SC's objective would be to make specific recommendations to the EDO which could be carried out (1) within the existing framework of 50.48 and Appendix R, and (2) without making a disruption in the effort already underway to implement fire protection requirements. The SC would attempt to make recommendations that could be immediately effective. However, we recognize that there may be some instances in which further study was needed. In such cases, we agreed to recommend a specific assignment and end date for such study. Finally, the SC agreed that its work would be completed through issuance of its report to the EDO by October 26, 1984.

Working Arrangements

The SC discussed how it could use the available resources most effectively. It was decided that the SC would not need to meet at this time with HQ and Regional people since their views have been expressed extensively in written and transcribed material. The SC did not feel the need to meet with industry for the same reason. However, the SC does wish to meet with Vic Stello and hereby offers the opportunity of a meeting with the recipients of this memo.

The SC will take advantage of the Working Group chaired by Faust Rosa and make assignments to that group and to certain individuals. It was our belief that use of currently available resources, including the Working Group, would be sufficient to achieve our objectives and schedule.

Issues

1. Adequacy of current guidance to industry.

The SC felt that enough guidance has been generated but that it needed to be made consistent with our recommendations and cleared up technically in some areas. The mechanism for this would be a generic letter, superseding previous guidance, to be sent to all licensees as promised at the regional workshops. This generic letter would be sent to the Commission, as requested at the Commission's May 30 meeting, before being issued to industry. The SC agreed that it would be best to utilize guidance already available, to the extent possible, to minimize possible confusion both within industry and the NRC. It was also agreed that we should utilize either Generic Letter 83-33 or the "Interpretations" rather than a third option for dealing with the exemption issue. This is discussed below.

The Working Group was tasked with reviewing all current guidance and outstanding technical questions and to revise the Regional Workshop package to incorporate in one place a comprehensive set of guidance that is consistent with the SC's policy recommendations and the approved technical recommendations of the Working Group.

2. Interpretation of the Appendix R requirements vice staff guidance.

The basic issue is whether industry can deviate from the contents of Generic Letter 83-33 without prior staff review and approval. This issue is fully developed by the current Staff DPO. The SC had the benefit of ELD's views and Faust Rosa's recommendations resulting from his assignment by Mr. Denton to make an independent assessment of this DPO. The SC decided that it could only support the contents of 83-33 as guidance to industry, consistent with the "Interpretations" drafted for the Regional Workshops since ELD advised that Generic Letter 83-33 stated requirements which went beyond the terms of Appendix R itself.

However, the SC also felt that some of the clarifying language contained in the DPO should be utilized and that specific guidance should be supplied to clearly indicate the level of fire protection to be achieved and the documentation necessary to demonstrate it. In addition, the SC felt that, at an appropriate time prior to the Appendix R inspection, the licensee should be requested to provide information necessary to

support the inspection for HQ and regional review. In addition, the licensees should be encouraged to meet with the staff to discuss plans before extensive hardware modifications are initiated.

The Working Group was tasked to work on language to support this recommendation as part of its work on item 1.

3. Treatment of expected future technical and schedular exemptions into late 1980s and early 1990s.

This item was discussed extensively and tabled when no clear direction was apparent. The concern is that some licensees may unduly request staff reconsideration of technical findings and/or implementation schedules which would in effect defer compliance. This item will receive priority consideration at the next meeting and no assignments were made. However, the SC felt strongly that the fire protection enforcement policy and current enforcement packages consistent with that policy should be issued promptly to demonstrate NRC resolve in this area and that the backlog in NRR be processed expeditiously.

4. Comparison of Appendix R and current NTOL plants for fire protection safety.

Based on statements made at the May 30 Commission meeting and correspondence from the Regions, there may be differences in the licensing evaluation and inspection practices for Appendix R plants and NTOLs. The Working Group was tasked with investigating if such differences do exist and how the goal of consistent levels of fire protection safety at all plants might be achieved. In pursuing this, it was suggested that the Working Group meet with representatives from HQ and the Regions active in fire protection reviews and inspections. It was also acknowledged that the existing Temporary Instruction for Appendix R safe shutdown inspections must be revised to be consistent with the new interpretations. The Working Group must also verify that the guidance documents referenced in the Temporary Instruction for use by the inspectors have been officially sent to all licensees and applicants.

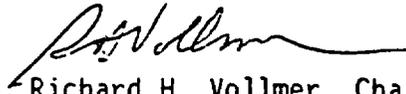
5. Adequacy of current inspection practices.

The SC was informed that consistent inspection practices and schedules have been set up for Appendix R plants but that the NTOLs have been handled on a somewhat ad hoc basis. Some regions have instituted a fairly extensive review of the capability to achieve a safe shutdown following a fire and others look more at SER-specific hardware items. Steve Richardson of IE was tasked with reporting to the SC, at the next meeting on current inspection content and schedules for all classes of plants, suggestions for modifying current practices, and, specifically, when the NTOL's should be inspected to assure effective compliance with NRC's fire protection requirements.

6. Identification and resolution plan for outstanding technical issues.

The Working Group was requested to identify any outstanding technical issues that impede Appendix R compliance. These will be discussed with the SC and a plan and schedule for resolution will be developed. One issue that was discussed is the QA standard to be applied to fire protection compliance. The SC felt strongly that the requirements of GDC-1 apply to fire protection features, recognizing that the activities are underway to resolve the GDC-1/Appendix B and safety-related/important-to-safety issues. Without trying to muddy the water in these areas, the SC felt that, at minimum, licensees be made aware that the fire protection program falls under GDC-1. The Working Group should look into this also and review the QA commitments made by some licensees in their pre-Appendix R SERs.

The next meeting of the Fire Protection Steering Committee will be held on September 27 at 9:00 a.m. in P-202A.



Richard H. Vollmer, Chairman
Fire Protection Policy Steering Committee

cc: W. Dircks
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