



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

October 12, 1984

MEMORANDUM FOR: Harold R. Denton, Director, NRR
Richard C. DeYoung, Director, OIE

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

SUBJECT: SECOND MEETING OF THE FIRE PROTECTION POLICY
STEERING COMMITTEE HELD ON SEPTEMBER 27, 1984

Summary

At its second meeting, the Fire Protection Steering Committee (SC) considered policy approaches to deal with technical and scheduler exemptions which threaten to put Appendix R implementation into the distant future, discussed SC activities with the IE and NRR Office Directors and Deputies, and was briefed on Working Group activities. As a result of this meeting, the SC made the following decisions:

- . the SC decided to hold a meeting with all HQ and Regional fire protection engineers, as a body, to candidly discuss their views on fire protection issues, problems, and possible future actions;
- . the SC decided that the most promising way to expedite Appendix R compliance is to initiate an aggressive inspection program which would steer and promote licensee compliance, assess the degree of fire safety, and exercise enforcement policy where appropriate; and
- . the SC decided that no further scheduler exemptions should be granted.

Discussion

1. Meeting with Office Directors and Deputies.

The SC met with Messrs. Denton, DeYoung, Case and Taylor to discuss their views on the fire protection problems, potential solutions, and SC activities. They viewed the problem as a lack of staff cohesiveness in a highly judgemental area exacerbated by industry reluctance to meet Appendix R requirements. They felt that a meeting between the HQ and Regional fire protection staff to air any problems, issues, and possible solutions, would benefit the SC's work. We agreed and set up such a meeting for October 2nd.

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It was also noted that, although industry was less than enthusiastic about fire protection, many problems have been solved and there have been significant improvements in fire protection of plants. To assist in defining fire protection problems and assessing safety significance, it was also suggested that we sort out fire protection and safe shutdown issues. The inclusion of fire protection features in Tech Specs was also discussed; namely, that they are not currently consistent, that augmenting of Tech Specs in this area has been proposed, and that such activities must be considered relative to general goals of simplifying Tech Specs. Finally, it was suggested that we need to better integrate the disciplines involved in this licensing and inspection area and identify a central point of responsibility.

2. Exemptions.

The SC discussed what, if anything, could be done to keep schedular and technical exemptions from dragging Appendix R implementation into the next decade. ELD stated that there was little we could do on technical exemptions since, if the utility has a valid reason for requesting one, then NRC must review it. On schedular exemptions, however, we can make a policy decision not to grant any more. Such a decision would have a legitimate basis since the Commission's Appendix R record viewed implementation in four or five years. Further, many 50.48 schedules have or are near running out. The SC decided that no further schedular exemptions should be granted.

The discussion turned to means of assuring that licensees recognized and could implement their responsibility for Appendix R implementation. The SC felt that the staff was taking on too much of the burden and that a well defined set of technical criteria, coupled with a program of inspection, and an enforcement policy would provide the best incentives. The SC felt that about five teams each consisting of a team leader and a fire protection, electrical, and systems engineer, should be set up. Each team, beginning in February 85, should go to one plant per month for a one-week inspection. These inspections would target plants of each type, each utility, and each A/E including NTOLs. Recognizing that plants in varying degrees of compliance would be inspected, the inspections should focus on safe shutdown. Where Appendix R implementation is still being engineered, the team should steer and promote licensee compliance in a technically supportable way. These inspections would also establish where each plant stands vis a vis Appendix R, and would use enforcement action where appropriate in a prompt fashion. It was suggested that there should be central and prompt resolution of any licensee/team disputes. This could be handled by a team consisting of a member of NRR, IE and the appropriate Regional management. The decision of this team would state the NRC position followed by a confirmatory letter or order as appropriate. Following such an inspection program, decisions on the long term fire protection inspections, both in extent and timing, would follow.


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3. Technical issues.

Two technical issues were identified to be pursued by the Working Group: (1) the Dow Corning ascertainment that penetration material was not being properly installed; and (2) whether our criteria on control room fires are appropriate and consistent.

4. Working Group discussion.

Faust Rosa discussed the Working Group activities, in particular, the outline of the Working Group report. All items of interest to the SC were covered in the outline of this report. However, it appeared that completion of the work as outlined was too ambitious for the time and resources provided. The SC indicated that priority attention be given to the completion of the generic letter package. The SC also indicated in its first meeting that the Working Group should compare fire protection requirements for ORs and NTOLs, review the adequacy of current inspection practices, and identify outstanding technical issues. These tasks should proceed except for the review of inspection practices which is superseded by the development of the program described in item 2 above.


Richard H. Vollmer, Chairman
Fire Protection Policy Steering
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