



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

October 19, 1984

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

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

SUBJECT: FOURTH MEETING OF THE FIRE PROTECTION POLICY STEERING
COMMITTEE

Summary

At its fourth meeting, the Fire Protection Policy Steering Committee (SC) again considered the generic letter to licensees, the enforcement policy guidance and the scope, timing and resources for the expedited fire protection inspections. The SC focussed on some of the peripheral issues which would be important to the success of the expedited inspections and other SC initiatives. At this meeting, the SC decided that:

- Prior to the fire protection inspections, a workshop would be held with IE, NRR, and Regional participants in the inspections to assure understanding in the objectives, scope, and technical issues and to help provide consistency between inspection teams;
- A team would be established to promptly handle disputes between licensees and the inspection teams; and
- That a standard condition should be incorporated into all licenses, requiring maintenance of the fire protection commitments but allowing change under 50.59 which do not decrease the level of fire protection with annual reporting to the Commission of such changes.

Discussion

1. Expedited inspections.

The SC discussed the scope, timing, and resources for the expedited inspections. There was a discussion of whether this should be a review or an inspection. The SC felt that the concept was one of an inspection rather than a review and that the availability of enforcement was important to the process. The SC discussed resources and concluded that an adequate pool existed; however it was not clear if or how the expedited

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inspections would affect other programs. The Working Group/IE was asked to complete a module to be used in these inspections and to plan out which licensees would be inspected to best achieve the objectives. A one-year schedule of plants and resources was requested by the SC.

The SC also discussed how to assure a common understanding of the objectives, scope, and technical issues by all participants in these inspections. To be effective, such inspections need to be uniform. The SC decided that a workshop would be held prior to initiation of the inspections wherein the SC would lay out the philosophy and intent, and technical and procedural issues would be discussed. The SC also decided that it would be important to have a central authority available to promptly and uniformly resolve disputes between the licensees and inspection teams. This was felt to be necessary so that major issues would not be left unsettled and so that licensees would not pursue fire protection solutions that would be unlikely to be acceptable to NRC. The Chairman of the SC was assigned to draft a charter and membership for this authority for SC's consideration. It was also agreed that the resolution of disputes by this authority would be promptly published to all inspection teams.

2. Generic Letter.

The need for a standard fire protection license condition was discussed. Problems resulting from inconsistent license conditions have been raised during the past year. It was agreed that a standard condition, similar to that drafted by ELD and NRR for current NTOLs, should be prepared. The SC discussed the timing for reporting of fire protection changes conducted under 50.59 and it was decided that annual reporting was appropriate based on other important 50.59 issues that utilize annual reporting. A discussion ensued on how to get such a license condition applied across the board to all licensees. The use of a Generic Letter or a 50.54(f) letter was discussed. ELD was tasked with developing a recommendation.

3. Enforcement Policy.

The SC discussed in detail a proposed fire protection enforcement policy. Some issues were settled and it was decided that the SC would complete this activity at its next meeting.

Finally, the SC decided to hold its next meeting on October 17 in Bethesda and to hold its final session in Chicago, for two days or more if needed, to complete activities and prepare a report to the EDO.



Richard H. Vollmer, Chairman
Fire Protection Policy Steering
Committee

cc: See next page

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