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May 15, 2003

Mr. John Hannon
Chief, Plant Systems Branch
Office of Nuclear Reactor Regulation
Mail Stop O11-A11
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT NUMBER: 689

Dear Mr. Hannon:

As part of our continuing support for the NRC rulemaking (67 FR 66578, *Voluntary Fire Protection Requirements for Light Water Reactors; Adoption of NFPA 805 as a Risk-Informed, Performance-Based Alternative*), we are enclosing for your review and comment Revision D of the implementing guidance for this proposed rule. This draft provides new detail in some significant areas of implementation, and considers the current proposed rule language. We look forward to receiving your comments on this guidance by August 11, 2003.

This transmittal includes four enclosures:

1. NEI 04-01 Revision D, *Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)*
2. NEI 04-01 Appendix A, *Fire Protection Definition Comparison*
3. NEI 04-01 Appendix B-1, *Transition of Fundamental Fire Protection Program and Design Elements* (in five files)
4. NEI 04-01 Appendix D-3, *Fire Modeling*

In comparison with Revision C, NEI 04-01 Revision D provides expanded discussion in the following areas:

- Section 2: Responsibilities and qualifications
- Section 6.2.1: Fundamental fire protection program and design elements transition review
- Section 6.2.3: Non-power operational modes transition review
- Section 6.6: Alternate methods and approaches
- Section 8.3: Plant change evaluations
- Section 8.4: Program documentation, configuration control, and quality assurance

Mr. John Hannon

May 15, 2003

Page 2

- Section 8.5: Monitoring
- Appendix A: Definitions
- Appendix B-1: Transition of fundamental fire protection program and design elements
- Appendix B-2: Transition of nuclear safety performance criteria
- Appendix C: Identification of performance criteria, fire hazards, and applicable SSCs
- Appendix D-1: Deterministic approaches
- Appendix D-2: Performance-based approaches
- Appendix D-3: Fire modeling
- Appendix D-4: PRA
- Appendix E: Risk-informed change evaluation
- Appendix G: Monitoring

If you have any questions, please contact me at 202-739-8080; am@nei.org or Fred Emerson at 202-739-8086 or fae@nei.org.

Sincerely,



Alexander Marion

Enclosures

c: Eric Weiss, U.S. Nuclear Regulatory Commission
Joe Birmingham, U.S. Nuclear Regulatory Commission
Suzanne Black, U.S. Nuclear Regulatory Commission