



NUCLEAR ENERGY INSTITUTE

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Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** Proposed Interim Staff Guidance on the Scoping of Fire Protection  
Equipment for License Renewal

**PROJECT NUMBER: 690**

Dear Dr. Kuo:

On November 13, 2002, you transmitted to us the proposed NRC interim staff guidance on the scoping of fire protection equipment for license renewal. Our response recommends a revision to the "Staff Position" and the "Rationale" to address industry concerns about NRC's proposed guidance.

We agree with the NRC's conclusion that "plant-specific licensing basis documents establish the basis for making FP scoping determinations." This conclusion should be more clearly stated in the Staff Position as the basis for fire protection equipment scoping for license renewal. These fire protection licensing bases are already well-established, and it is unnecessary for the Staff Position and the supporting Rationale to attempt to re-define plant-specific licensing bases. This re-definition leads to the following industry concerns:

1. It expands the scope of the fire protection equipment required to comply with 10 CFR 50.48 beyond that which is currently in fire protection licensing bases. This is an inappropriate role for a license renewal interim staff guidance document.

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2. It requires more fire protection equipment to be included in the scope of license renewal than is required by the current licensing basis to comply with 10 CFR 50.48.

The recommended changes to the guidance document are provided in Enclosure 1 along with a fuller discussion of these concerns.

If you have any questions about this transmittal, please contact me at 202.739.8080; [am@nei.org](mailto:am@nei.org) or Fred Emerson 202.739.8086; [fae@nei.org](mailto:fae@nei.org).

Sincerely,



Alexander Marion

Enclosure

c: John Hannon, NRC  
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