

April 29, 2003

MEMORANDUM TO: Eric Weiss, Chief
 Fire Protection Engineering and Special Projects Section
 Plant Systems Branch
 Division of Systems Safety and Analysis

FROM: Mark Henry Salley, Fire Protection Engineer/RA/
 Fire Protection Engineering and Special Projects Section
 Plant Systems Branch
 Division of Systems Safety and Analysis

SUBJECT: SUMMARY OF APRIL FIRE PROTECTION CONFERENCE CALL WITH
 REGIONS

The purpose of this memorandum is to keep you informed of ongoing activities in the Fire Protection area while you are on special assignment.

On April 2, 2003, the staff held its monthly fire protection conference call with the regions. The representatives from the regions participating in the call were: Charles Ogle and Charlie Payne from Region II, James Linville Roy Fuhrmeister and Keith Young, from Region I, Bob Daley from Region III, and Ray Mullikin and Rebecca Nease from Region IV. Engineers from NRR included, Phil Qualls, Paul Lain, Tanya Mensah, Peter Koltay, Daniele Oudinot. I facilitated the discussion while Daniele Oudinot kept the group focused on the agenda (Attachment 1) and recorded the minutes of the meeting.

I summarized the results of the NRC/NEI FP management meeting on March 18, 2003 (see the HOT TOPICS dated March 24, 2003, the NRC Memorandum from J Birmingham to C. Grimes dated March 25, 2003 (ML030860779), the Inspector guidance developed after the February 19, 2003, Facilitated Workshop (see the HOT TOPICS dated February 24, 2003, and the NRC Memorandum from J. Hannon to C. Carpenter dated March 19, 2003, (ML030780326).

The regional representatives provided the following feedback on agenda items:

1. The regions would like to receive guidance on post-fire safe-shutdown associated circuit inspection before the inspections resume.
2. The regions unanimously asked to review and comment on Daniele's "Protocol for the Resolution of Emerging Fire Protection Issues" before it is submitted to NEI.
3. The regions agreed that a pilot program for manual actions was not needed.
4. The regions suggested that specific dates be set for inspector training on associated circuits and tentatively agreed on September 3rd and 4th, 2003. The regions also requested that manual actions update/training be included in this session.

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5. The regions would like to receive a copy and provide comments on BNL draft NUREG/CR on FSSD circuit analysis. The regions are of the opinion that the NUREG/CR is a very valuable reference document and they would like to see it completed and issued. After discussing this with John Hannon, he directed me to add this item to the Fire Protection Improvement Plan (FPIP).

6. The regions questioned the fact that they had not been asked to comment on NEI 00-01 since they will be expected to work with it at the plants. They requested to see the review and staff comments on NEI-00-01. (Attachment 2) The regions also requested that they be allowed to review and comment on the next revision of NEI-00-01. After discussing this with John Hannon, I was directed to add this item in the FPIP.

7. NFPA 805. There was a general discussion on how to motivate the licensees to adopt NFPA 805. Region I noted that the hardware modifications that may be required for the adoption of NFPA 805 could be costly. Paul Lain stated that NEI will be holding a table top exercise at Farley on the implementation guidance for NFPA 805. This exercise will be observed by RII Inspectors and Paul.

8. Regional attendance feedback at NRC/NEI Fire Protection Management Meetings. At the March 18, 2003, NRC/NEI Fire Protection Management meeting, NEI welcomed having Chuck Casto (RII) attend the meeting to provide a regional perspective. I suggested that at least one regional representative participate in meetings with NEI at headquarters. The regions unanimously agreed with this suggestion.

9. Manual actions. The regions noted that licensees need to take or plan to take corrective actions (CR report) since, technically, they are in minor violation until the EGM is lifted. Licensees may keep a CR on their books during 60 or 90 days until the EGM is lifted. Tanya Mensah reported that Suzie Black's suggestion was to look at historical data. The SPLB staff has compiled approximately 40 examples yet to be classified. This data will be proposed as a discussion topic during the quarterly workshop with the regions.

10. Lessons learned from the first round of Triennial Fire Protection Inspections. Tanya Mensah reported that the Fire Protection Project and Engineering Section staff is compiling data on lessons learned from the first round of triennial inspections. Once the report is completed and reviewed by John Hannon, it will be submitted to the regions for comment.

11. Sequoyah removal of Fire Watches as Compensatory Measures. Phil Qualls reported that the licensee had removed the requirement for fire watches in all areas where there is detection. The equipment located in the areas where fire watches have been removed is not required for safe shutdown. However, even though there is no adverse effect on safe shutdown, licensees must meet GDC3 on equipment important to safety. The staff is supporting RII in drafting a violation.

12. Significance Determination Process (SDP). Paul Lain reported that the seven task groups in support of SPSB Fire Protection Significance Determination Process revision effort provided their input in mid February. A draft integrating all inputs will be revised by the end of May. A table top exercise is planned for the end of June.

Please contact Daniele Oudinot on 415-3731, or Mark Salley on 415-2840 if you require any additional information.

Attachment: As stated

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Attachment 1

Agenda - NRR/Regional Fire protection Counterparts phone call April, 2, 2003

1. Highlights of March 18, 2003, NRC/NEI Management Fire Protection Working Group Meeting

- Potential incentives to promote adoption of NFPA 805 (e.g., credit for self-assessments and enforcement discretion during transition).
- Regional feedback on NEI concerns with inspections in the areas of post-fire safe shutdown and the regulatory process. (Chuck Casto represented the Regions)
- Clarify the process and documentation necessary to provide fire protection issue closure. (NEI suggested a protocol)
- Interim inspection guidance for manual actions.
- The pilot program for manual actions. (Steve West presentation)
- Compliance issues for associated circuits in light of new inspector guidance being developed.
- Planned evaluation of lessons learned from the first round of triennial inspections. (Vincent Klco presentation)
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The next Staff/NEI fire protection meeting is tentatively planned for April 15 (prior to the RIC).
(M. Salley)

2. Results of February 19, 2003, Associated Circuit Workshop Fire Protection Staff/NEI Meeting

On March 20, 2003, SPLB staff met with representatives of NEI and various utilities in a regularly scheduled meeting sponsored by the Inspection Program Branch to present the "Proposed Risk Informed Inspection Guidance for Post-fire Safe-shutdown Associated Circuit Inspection" (Adams Accession No. ML030780326). This inspection guidance was developed as a result of technical consensus achieved at the Facilitated Workshop conducted February 19, 2003, regarding the most risk significant associated circuits. Providing this guidance fulfilled the staff's commitment made at the Facilitated Workshop, to give the public an opportunity to review and comment on this guidance.
(M. Salley)

3. Regional Review of NEI-00-01 (C. Payne - Region II/Rebecca Nease RIII)

4. Regional Review of BNL draft NUREG/CR on FSSD Circuit Analysis (C. Payne - Region II/Rebecca Nease RIII)

5. Fire Protection SDP progress

The task forces are putting together a draft fire protection SDP based on input from focus group discussions between NRC staff and NEI/industry representatives. We plan to have a public meeting during the week of April 21, 2003. The date is to be determined depending on the availability of key participants. NRC Regional staff input is requested before the draft is finalized for tabletop and benchmarking exercises.
(Paul Lain)

Attachment 2
Latest NRR reviews of NEI 00-01

NEI 00-01 Draft Rev. C (ML012950365)

NRC Comments (ML020660025)

NEI response to NRC comments on Draft Rev. C (ML030410105)

NEI 00-01 Draft Rev. D (ML023010376)

NRC Comments (ML023500247)