From: Charles Casto , RII
To: Charlie Payne
Date: 3/19/03 10:38AM
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thanks...if you don't have power point...let me know

NN/7

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Fire Protection, Session T10

Fire Protection Session Chair

Suzanne Black

Deputy Director
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United States Nuclear Regulatory Commission

April 17, 2003

RIC 2003
Fire Protection, Session T10
Challenges and Solutions

Alex Marion
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April 17, 2003

Challenges and Solutions

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Inspection Finding or Backfit

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April 17, 2003

Inspection Finding or Backfit

- All licensees are committed to 10 CFR 50, Appendix R, Section III.G
- Sections III.G.1/G.3 allow use of manual actions (with conditions)
- Section III.G.2 Provides no provision for use of manual actions as alternative to acceptable cable and separation methods
- Some inspections found licensees relied on manual actions instead of replacing or upgrading deficient Thermo-Lag Barriers
- Generally, these changes did not receive NRC staff evaluation or approval

Inspection Finding or Backfit

- Using manual actions in lieu of passive features, without adequate evaluation, could result in a significant increase in risk
- Staff received training on this issue in November 2001
- Reviewed NUREG-1409, "Backfitting Guidelines" regarding tacit approval in inspection reports
- Evaluating the feasibility of a manual action without reviewing prior licensing approval is an example of not challenging a licensee's practice. This would not constitute tacit approval
- If a manual action is erroneously accepted in an inspection report as specifically meeting III.G.2 of Appendix R, and a determination is made that the action is needed to restore compliance, per NUREG-1409 no backfit analysis would be required

Inspection Finding or Backfit

- Appendix R, III.G.2 has no provision for generic use of manual actions in lieu of cable and equipment separation requirements
- Inspector guidance is a compilation of existing guidance from NRC generic communications and Regulatory Guide 1.189
- Guidance focuses on risk significance which may not be consistent with licensing bases. Findings processes in accordance with ROP
- Guidance has not changed. But the inspectors' understanding of the guidance and associated regulations has improved. Guidance is not a requirement – it's a tool for the inspector
- Consequently, this is not a backfit situation

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Fire Protection Improvement Plan

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United States Nuclear Regulatory Commission

April 17, 2003

Fire Protection Improvement Plan

- NRR is providing increased management attention to address both emerging and longstanding fire protection issues.
  - Establish timely closure plans
  - Work with stakeholders to produce safe and realistic solutions
- NRR welcomes input from all interested stakeholders on how to resolve fire protection issues.
- Risk-informed methods and techniques will be prudently employed to provide reasonable assurance of safety when developing solutions to fire protection issues.

Fire Protection Improvement Plan

- Proposed Circuit Analysis Inspection and Resolution
  - Inspection plan to support the withdrawal of the circuit analysis EGM (Enforcement Guidance Memorandum)
    - Risk-Informed input
    - Stakeholder input
    - Inspection Guidance
    - Training Workshops
  - Resolution Plan
    - Stakeholder Input
    - Initiate Rulemaking Plan
    - Initiate revision of RG 1.189

Fire Protection Improvement Plan

- Management of Emerging Fire Protection Issues
  - Incentives for adopting NFPA 805
  - Interim inspection guidance for manual actions
  - Scoping for license renewal
    - Current licensing basis issue within Part 50

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NFPA 805

Wayne Holmes
Vice-President of Professional Loss Control
Chairman of NFPA Technical Committee
Fire Protection for Nuclear Facilities

April 17, 2003

NFPA 805

NFPA 805

NFPA 805

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Advances in Fire Modeling and Fire PRA

Scott Newberry

Director

Office of Research

United States Nuclear Regulatory Commission

April 17, 2003

Advances in Fire Modeling and Fire PRA

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NFPA 805 Industry Initiatives

Gary Gates
Vice-President and Chief Nuclear Officer
Omaha Public Power District

Chairman
NEI Fire Protection Working Group

April 17, 2003

NFPA 805 Industry Initiatives

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- Concluding Remarks
- Open Forum

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