

INDUSTRY/NRC FIRE PROTECTION ISSUE MANAGEMENT TRACKING LIST
Draft 4 – February 20, 2004

Track-Ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
805-1a	NFPA 805 Incentives/NEI ltr	N – ? I - High	Interim response provided	Proposed	Final response to first NEI letter needed	N		NEI Letter 2/13/03 NRC response 8/28/03
805-1b	NFPA 805 incentive/NEI ltr	N – ? I - High	Proposing to Commission	Proposed	Include in SECY	N	April 2004	NEI Letter 9/11/03 NRC response 2/10/04
805-2	NFPA 805 implementing guidance pilot report/NEI submittal	N – ? I - Med	Reviewing	Submitted	Provide comments	N		NEI submitted 11/5/04
805-3	Processing of licensing basis issues for licensees adopting NFPA 805 (issue needs more definition; not discussed recently)	N - ? I - ?			Discuss at next Issue Management Meeting	N, I		
805-4	NFPA Implementing Guidance Rev E (specific examples below from 10/15/03 mtg and 1/7/04 ltr) Remove statement from Draft NEI 04-02 indicating the new rule supersedes 10 CFR 50 Appendix A criteria Remove guidance that implied endorsement of NEI fire models Move guidance on the use of NFPA 805 tools by licensees not transitioning to NFPA 805 to one place Add a discussion in 8.3.6.2 to more fully address the potential risk implications as to the limiting fire scenario Review complexity in following NEI 04-01 as a result of its different layout from NFPA 805	N – ? I - High	Make necessary changes to NEI 04-02	Preparing Rev E	Submit to NRC	I	3/31/04	NRC comments Rev D 1/7/04
805-5	Provide examples of inconsistencies in Draft NEI 04 01 Rev. D with existing regulatory guidance (10/15/03 mtg)				Complete			NRC comments Rev D 1/7/04
805-6	Consider adding guidance to the Rule Statements of Consideration regarding the Rule's place in the regulatory hierarchy (10/15/03 mtg)	N – ? I -	Requested	Developing	Develop	N		

Track -Ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
805-7	Review NRC guidance on defense-in-depth and safety margin (10/15/03 mtg)				Complete			NRC comments Rev D 1/7/04
805-8	Provide examples demonstrating the complexity in following document as a result of its different layout from NFPA 805 (10/15/03 mtg)				Complete			NRC comments Rev D 1/7/04
805-9	Provide feedback regarding timeframe for moratorium on enforcement (10/15/03 mtg)				Complete			NEI letter 12/18/03
CF-1	Fire-induced circuit failure (FICF) inspections/self-assessment pilots counter-proposal from NRC				Complete			NEI letter 10/3/03 NRC response 2/12/04
CF-2	NEI 00-01 full response/ (integrated closure plan for circuit failure issues) (specific issues below from 10/17/03 mtg) Review the treatment of model and parameter uncertainty with regards to sensitivity. Provide NEI with some comments to return the tone of NEI 00-01 to guidance versus a policy document and provide comments regarding changes needed in NEI 00-01 to conform to regulatory policy. Review how the implementation guide will be treated should the NRC decide to endorse its use.	N - ? I - High	Developing	Requested	Response to NEI letters	N	3/7/04	NEI letters 4/09/03 & 5/22/03 SW email 2/11/04
CF-3	NEI 00-01 meeting to discuss management issues				Complete			Meeting held 1/28/04
CF-4	Associated circuit inspections	N - ? I - Low	Developing RIS, SDP, and revising guidance	Must have appropriate SDP in place	Develop RIS, inspection guidance	N	RIS due February 27	68 FR 49529 Inspection Guidance 9/18/03 NEI letter 9/23/03 SW email 2/11/04
CF-5	Provide feedback to industry on the issue date for NUREG-1778 (10/17/03 mtg)	N - I - High	Provided for comment	Commenting	Provide comments	I	3/26/04	Draft NUREG-1778

Track- ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsi- bility	Action Due Date	Applicable References
CF-6	Provide feedback to industry on the regulatory standing for NUREG-1778 (10/17/03 mtg)	N - ? I - High	Feedback requested		Provide feedback	N		
FB - 1	Hemyc test plan	N - ? I - Low	Complete testing arrangements	Observe/participate in tests	Provide final comments to NRC on how test specimens should capture in-plant configurations	I		NRC test plan
FP-1	CO2 system lockouts – determine if generic issue (call 10-10-03)	N - ? I - ?	Provided basis	Preparing summary	Provide issue summary to industry; determine extent of issue in industry	I		Draft summary of emerging fire protection issues (NRC), provided by e-mail 10/9/03
FP-2	Industry response to NRC position on NEI 02-03	N - ? I - Med		Preparing	Complete and submit	I		NEI 02-03, Rev 0 NRC presentation 9-17-03 (Information Forum)
FP-3	Use of fire watches for non-safety compliance issues (mtg 8-21-03)	N - ? I - Med	Determine if compensatory measure white paper will be issued as an Information Notice or Regulatory Issue Summary or remain as white paper	None	Complete and provide to stakeholders	N		Discussed again 10/10/03
FP-3	Epoxy coatings/flame spread (10/10/03 call)	N - ? I - Low	Provided basis	Preparing summary	Provide issue summary to industry; determine extent of issue in industry	I		Draft summary of emerging fire protection issues (NRC), provided by e-mail 10/9/03
FP-5	2003 National Regional Utility Group action item on NRC regional public workshops (mtg 8/21/03)	N - ? I - ?			Obtain industry feedback (industry concerns/recommendations)	I		
I/SA-1a	FP self-assessments – NRC consider fast track for implementing	N - ? I - Med	Will consider when engineering self-assessment activity complete	Develop self-assessment guidance	Complete engineering self-assessment	N		
I/SA-1b	FP self-assessments – NRC consider fast track for implementing	N - ? I - Med	Will consider when engineering self-assessment activity complete	Develop self-assessment guidance	Complete and implement revised self-assessment guidelines	I		
I/SA-3	Information Notice on triennial results	N - ? I - Low	Preparing	None	Complete IN	N		
INPO-1	Scope of INPO assessment activities in fire protection				Complete			INPO to issue self-assessment document

Track -ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsi- bility	Action Due Date	Applicable References
								in February 2004
MA-1	Draft feasibility criteria handed out at October 17 meeting	N – ? I - High	Comments provided	Reviewing comment	Develop SECY; meeting with stakeholders to discuss comments?	N		October 17 NRC handout on manual actions feasibility criteria FR 66501 NEI ltr 1/27/04
MA-2	Enforcement discretion for manual actions inspection findings	N – ? I - High	Need to develop per Commission direction	Enforcement discretion should be implemented soon and retroactively relative to feasible manual actions	Develop provisions for enforcement discretion in inspection of manual actions	N		SECY 03-100 and corresponding SRM
MA-3	Alternate shutdown manual actions	N – ? I - Med	Will consider in rulemaking same feasibility criteria for alternate shutdown m/a as for redundant shutdown m/a	Same feasibility criteria should apply as for redundant shutdown manual actions	Develop and include appropriate position for draft rulemaking	N		

NOTES:

Definitions

805 – issue related to NFPA 805 rulemaking or implementation

CF – issue related to circuit failure issue closure, NEI 00-01, or associated circuit inspections

FB – issue related to fire barriers

FP - general fire protection issue

INPO – issue related to INPO

I/SA – issue related to fire protection inspections or self-assessments

MA – issue related to manual actions