

Fire Protection Issue Management

NEI Fire Protection Working Group
Westinghouse Owners Group

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Topics to Discuss

- Associated circuit inspections/NEI 04-06
- RCP Seal Cooling
- NFPA 805 licensing basis issues
- Regulatory status of NUREG-1778
- CO2 system lockouts
- Epoxy coatings/flame spread
- Issue management status

2



Associated Circuits/NEI 04-06

- Associated and required circuits
 - Restarted inspections likely to review both types of circuits
 - Self-assessments should review both types to prepare for restarted inspections
 - NEI 04-06 uses RIS criteria for both types
 - Failure mechanisms and consequences of failure similar
 - Risk-informed criteria appropriate for both types

3



Associated Circuits/NEI 04-06

- Associated and require circuits
 - Clarify NRC inspection criteria
 - Associated circuits: Use RIS criteria
 - Required circuits: Use same criteria
 - In practice, treated similarly by plants
 - Could be significant effort to differentiate

4



RCP Seal Cooling

- **Generic issue**
 - Westinghouse Owners Group presentation

5



10 CFR 50.48(c) Adoption

- **Licensing basis issue processing**
 - NRC staff positions

6



10 CFR 50.48(c) Adoption

- **Enforcement discretion provision for resolution of existing issues**
 - One year needed for licensee letter of intent
 - Licensee budgets for 2005 already established prior to effective date of rule
 - 2006 is earliest licensees can budget transition costs
 - Will also permit completion and review of regulatory guide

7



10 CFR 50.48(c) Adoption

- **Licensee more likely to adopt the new rule with**
 - Successful use and staff acceptance of risk-informed techniques
 - Faster resolution of plant-specific and generic issues

8



NUREG-1778

- **Regulatory standing of NUREG-1778**
 - Disposition of stakeholder comments
- **Licensee compliance with licensing basis**
- **Response on use of NEI 00-01 needed to complete resolution of fire-induced circuit failure issues**
 - Associated/required circuit self-assessments
 - Safe shutdown program reviews
 - Licensing basis documentation
 - Use of risk tools to address safe shutdown issues
 - Consideration of adopting 10 CFR 50.48(c)

9



CO₂ System Lockouts

- **NEI surveyed industry plans for changes to automatic CO₂ systems**
 - Some considering system changes
 - Conversion to manual system
 - Substitution of alternate suppression system
 - Some plan no system changes
- **NEI proposes to develop white paper providing guidelines to licensees for system changes**
 - NRC review/concurrence will be requested
- **Threshold for license amendments needs to be addressed**

10



Epoxy Coatings / Flame Spread

- **NEI conclusions from industry survey**
 - Coatings should not be considered credible source of flame spread
 - Combustible properties less severe than for other materials not requiring testing
 - Combustible loading insignificant
 - Not a risk-significant issue
 - NRC attention required only for plants with unusual configurations that substantially increase the fire hazard
 - Inspection guidance should reflect this
 - No further consideration as generic issue needed

11



Issue Status

- **Review of issue management status summary**
- **Summarize action items**
- **Address possible process improvements**
- **Schedule next meeting**

12

