



Why Transition to NFPA 805?

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Benefits



- Safety
- Streamlined
- Simplicity
- Savings



Improvements in Plant Safety



- Expansion to all modes of operation
- Focus resources on risk significant issues
- Promote identification and correction of vulnerabilities



Regulatory Flexibility



- Own the change control process
- Respond to emerging issues
- Reduce unnecessary regulatory burden



Simplified Inspection and Enforcement



- Interim enforcement discretion
 - Corrective action program
 - Items identified during transition
- Establish a clear licensing basis
- Allow alternate resolution for items in the corrective action program
- Standardized tools for fire PRA



Overall Savings



\$3.4m

\$2.4m

- Transition costs¹: \$0.2 \$0.6 million
- 30 year² Projection
 - Reduced exemption and license amendment requests \$3.0m
 - Reduced cost to disposition non-compliances
 - Reduced compensatory measures
 - Miscellaneous (reduced maintenance & equipment, etc) \$3.0m
- Approximate savings projected: > \$11 million

¹ NEI pilot at McGuire \$375,000 ² With license renewal



Summary



- Safety
 - Improvements in plant safety
- Streamlined
 - Regulatory flexibility
- Simplicity
 - Simplified inspection and enforcement
- Savings
 - A positive cost benefit