

# **NFPA 805 REGULATORY GUIDE**

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# Briefing Outline

- Purpose
- NFPA 805
- Safe Today-Safe Tomorrow
- Regulatory Guide Scope
- Key Issues
  - NRC Approval
  - Plant Changes
  - Post Fire Safe Shutdown Circuit Analysis
  - Operator Manual Actions
- Conclusions

# Purpose

- NRR seeks CRGR endorsement to publish a new Regulatory Guide, *Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants.*

# NFPA 805

- NFPA 805 Rule {10 CFR 50.48(c)} provides a VOLUNTARY alternative to 10 CFR 50.48(b)
- CRGR waived NFPA 805 Rule review during rulemaking
- NFPA 805 Rule endorses NFPA Standard 805 (2001 Edition) with minimal exceptions
- NFPA 805 Regulatory Guide endorse NEI 04-02 with minimal exceptions

# SAFE TODAY-SAFE TOMORROW

- “Safe Today-Safe Tomorrow” philosophy enables transition to NFPA 805 with an appropriate burden to licensees and staff
- “Safe Today-Safe Tomorrow” enables transitioning while maintaining or enhancing safety
- “Safe Today-Safe Tomorrow” does NOT tacitly approve unreviewed evaluations (i.e., issues remain inspectable per ROP)

# REGULATORY GUIDE SCOPE

- Endorses of NEI 04-02, Rev 0
- Provides clarifications to NEI 04-02, when appropriate
- Takes exceptions to NEI 04-02, when appropriate
- Endorses high-level guidance on license amendment request, transition, enforcement discretion and documentation, provided in NEI 04-02
  - Describes the appropriate use of Fire Models
  - Describes the appropriate use of fire PRA methods
  - Describes the staff positions on NFPA 805's Appendices

# **KEY ISSUE**

## **NRC APPROVAL OF EXISTING PROGRAM ELEMENTS**

- Endorses documentation of NRC approval
- Provides guidance on staff SER and exemption request approvals
- Provides position on the role of inspection reports, meeting minutes, and other licensing basis documents

# **KEY ISSUE**

## **PLANT CHANGES**

### **MODIFICATIONS AND DEVIATIONS**

- Endorses NEI 04-02 guidance on integrated risk assessment, defense-in-depth, and safety margin
- Endorses NEI 04-02 guidance on screening of inconsequential changes
- Endorses NEI 04-02 guidance on the use of deterministic methods, fire models, and risk assessment



# **KEY ISSUE**

## **POST FIRE SAFE SHUTDOWN CIRCUIT ANALYSES**

- Endorses NEI 00-01, “Guidance for Post-Fire Safe Shutdown Circuit Analysis”
- Advocates handling of spurious actuations using risk-informed and performance-based methods

# **KEY ISSUE**

## **OPERATOR MANUAL ACTIONS (RECOVERY ACTIONS)**

- Ongoing Rulemaking
- Can transition Manual Actions as plant change for Appendix R III.G.2 areas
- NFPA 805 requires a performance-based evaluation for Recover Actions

# CONCLUSION

- Since NFPA 805 Rule is a voluntary rule, and the regulatory guide is endorsing industry guidance (NEI 04-02,) it can be concluded that the regulatory guide does not cause undue burden to licensees.
- The CRGR should endorse the NFPA 805 regulatory guided for publication.