

August 15, 2005

STAKEHOLDERS: Nuclear Energy Institute,
and Industry Representatives

FROM: Sunil Weerakkody, Chief */RA/*
Fire Protection and Special Projects Section
Division of Systems Safety and Analysis

SUBJECT: SUMMARY OF JULY 2005 CONFERENCE CALL WITH NUCLEAR
ENERGY INSTITUTE TO DISCUSS STATUS OF FIRE PROTECTION
ISSUES

In 2003, the U. S. Nuclear Regulatory Commission (NRC) staff, Nuclear Energy Institute (NEI), and industry representatives developed fire protection issue management protocol (IMP) [ADAMS Accession No. ML031210232] to define a process for identifying, tracking, and resolving issues that may arise during NRC or industry review of guideline documents, plant-specific events, generic trends, and NRC research findings. The IMP does not displace any regulatory processes, but the IMP may supplement the regulatory process for issues that arise that do not yet meet the threshold of requiring regulatory action. On January 28, 2004, a suggestion was made to hold monthly calls between members of the NRC and NEI to determine the status of the items, provide any additions or updates, and review/revise priorities. NEI took the action to take the lead to maintain the list of issues and add priority and status information. Public meetings would be held at regular intervals to discuss the specifics or resolve any concerns.

On July 25, 2005, the NRC staff conducted a conference call with representatives of the NEI and members of industry. This call was intended to determine the status of those items on the Issue Management Tracking List, provide any additions or updates, and review/revise priorities. Prior to the phone call, NRC staff provided NEI and industry representatives a draft version of the tracking list (Attachment 1- Draft 4). During the meeting changes were made to the tracking list, and the final version of the tracking list is included as Attachment 2, Draft 5.

Attachment 2 includes two tables, Active Items and Completed Items. The Active Items will be used as talking points for the next meeting. The completed items will be available as a resource if needed. Following the next meeting, the completed items will not longer be included in the tracking list.

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Below is a list of the issues that were added to Issues Management Tracking List (ML041480161), since the NRC published the last list. These issues are as follows:

NFPA 805 - 10CFR50.48(c) Fire Protection Rule - Reg Guide - Item 805-8

Circuit Failure

- Clarification RIS - Item CF-8
- Generic Letter - Item CF-9

Other Fire Protection

- Containment Oil Misting - Item FP-7
- Mrule Consideration of Fire - Item FP-8
- Fire Hydrant (Grease Problem) - Item FP-9

The participants on the conference call are listed below:

NRC Participants

R. Dipert
D. Frumkin
S. Weerakkody
P. Lain
P. Qualls
A. Klein
N. Iqbal

NEI and Industry Participants

A. Marion
C. Pragman
D. Brandes
K. Singer
R. Richter
F. Garret

Attachments: 1. Draft 4 - Issue Management Tracking List
2. Draft 5 - Issue Management Tracking List

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INDUSTRY/NRC FIRE PROTECTION ISSUE MANAGEMENT TRACKING LIST
Draft 4 - July 2005

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
NFPA 805/10 CFR 50.48(c)								
805-3	Processing of licensing basis issues (how issues are to be handled during transition) for licensees adopting NFPA 805 (issue needs more definition)	N - High I - High	Addressed in 69 FR 33685 and DG-1139	Addressed in public comments on DG-1139 (NEI #4). More details required in DG-1139 and/or NEI 04-02	To be included in NEI 04-02 and NRC R.G.	N, I		DG-1139, NFPA 805, 69 FR 33685, NEI 04-02
805-4	<i>NFPA Implementing Guidance, NEI 04-02, Rev 0 (specific issues are tracked individually)</i>	<i>N - High I - High</i>	<i>Complete NEI 04-02 expeditiously to support industry adoption of NFPA 805 licensing basis</i>	<i>Will address NRC comments on Rev F of NEI 04-02; Maximize content of NEI 04-02, minimize DG-1139 content</i>	<i>Submit Rev. 0</i>	<i>Complete</i>		<i>ML051430568</i>
805-6	<i>Consider adding guidance to the Rule Statements of Consideration regarding the Rule's place in the regulatory hierarchy (10/15/03 mtg)</i>	<i>N/A</i>	<i>SECY 04-0050 issued</i>			<i>Complete</i>		<i>SECY 04-0050</i>
805-7	<i>NRC response to public comments on DG-1139</i>	<i>N -High I - High</i>	<i>Staff preparing response; public meeting to discuss draft responses on 1/26/05</i>		<i>Formally issue responses (SOC)</i>	<i>Complete?</i>	<i>???</i>	<i>Comment/Response handout for 1/26/05 mtg ML050480240</i>
805-8	NRC issue final reg guide for adoption of NFPA 805 licensing basis (specific issues are tracked individually)	N - High I - High	Minimize RG content - include guidance in NEI 04-02	Agree with NRC position; RG should fully endorse NEI 04-02	NRC to Complete R.G.	N		DG-1139, NEI 04-02
805-9	Additional 805 Actions							
Circuit Failure								

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
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 - High I - High	Developing. Letter at Division Director level, expected out shortly. CF workshop expected September 8-9	Requested	Response to NEI letters Schedule July meeting to discuss issue prior to workshop in September	N N, I N N,I		NEI letters 4/09/03 & 5/22/03 SW email 2/11/04
CF-4a	<i>Circuit inspections</i>	<i>N - High I - High</i>	<i>Preparing for resumption of inspections</i>	<i>Must have appropriate SDP in place</i>	<i>Develop inspection guidance before associated circuit inspections resume</i>	<i>Complete</i>		<i>Guidance in IP 71111.05 SDP in IMC 0609, Appendix F</i>
CF-4b	<i>Circuit inspections</i>	<i>N- High I - High</i>	<i>Preparing for resumption of inspections</i>	<i>Conduct preparatory self-assessments</i>	<i>Provide Rev L of NEI 04-06</i>	<i>Complete</i>		<i>Sent March 16, 2005</i>
CF-4c	<i>Circuit inspections</i>	<i>N - High I - High</i>	<i>Inspections have resumed</i>	<i>NRC accept self-assessment guidance</i>	<i>Response to Rev L of NEI 04-06</i>	N	06/30/05	
CF-6	<i>NUREG-1778</i>	<i>N -Low I - High</i>	<i>Feedback requested Comments provided</i>		<i>No action</i>	<i>Complete</i>		<i>NUREG-1778 deferred</i>
CF-7	<i>Release report on NEI 00-01 pilots</i>	<i>N - Med I - Low</i>			<i>Determine if summary of report can be provided in the near future</i>	I		
CF-8	<i>RIS for clarification of circuit analysis terms</i>	<i>N - High I - Low</i>	<i>Positions stated in RIS</i>	<i>Varies</i>	<i>Incorporate stakeholder comments and finalize RIS</i>	N		<i>Draft RIS ML051110160</i>
CF-9	<i>Additional clarification of circuit analysis terms</i>	<i>N-High I-low</i>	<i>Additional issues may require clarification</i>		<i>NRC to determine if additional clarifications are needed</i>	N		

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
Fire Barrier Issues								
FB - 1	Hemyc test plan	N – High I - Low	Complete testing arrangements expeditiously. No plans for soliciting further comments on test plan.	Observe/participate in tests. Provide comments on test setup prior to tests.	Complete test plan	Complete		NRC test plan ML051040193
FB-2	Hemyc Testing	N-High I-Low	Complete testing		Complete Testing	Complete		ML051190046 – Hemyc ML051430409 - MT
FB-3	Information Notice on Hemyc Results	N-High I - ?	Inform Industry of unexpected test results		Issues IN	Complete		ML050890089
FB-4	Generic communication on Hemyc/MT test results	N- High I-?	NRC will collect information regarding Hemyc/MT and licensees will act to ensure compliance is met		NRC to issue draft generic communication on Hemyc/MT	N	July 2005	Fire protection web site has been updated with applicable references.
Other Fire Protection Issues								
FP-1	CO2 system lockouts – determine if generic issue (call 10-10-03) – address risk significance	N - Med I - Low	Provided basis. Relatively high risk issue.	Develop white paper	Develop white paper for NRC concurrence before sending to industry	Complete		White paper submitted Jan. 31, 2005
FP -1a	CO2 System Lockouts	N-Med I-Low			NRC to respond to NEI white paper	N	July 05	
FP-2	Industry response to NRC position on NEI 02-03	N – Med I - Med		Preparing	Complete and submit	I	July 15	NEI 02-03, Rev 0
FP-3	Use of fire watches for non-safety compliance issues (mtg 8-21-03)	N – Low I - Med	Determine if compensatory measure white paper will be issued as generic communication	None	Issue position in final form	Complete		RIS 2005-07 - issued
FP-4	Epoxy coatings/flame spread (10/10/03 call)	N – Med I - Low	Provided basis	Preparing summary	Provide letter to NRC with recommendations on issue resolution	Complete		
FP-4a	Epoxy coating/flame spread	N-Low I-Low			NRC to respond to NEI white paper	N	June 30	
FP-5	2003 National Regional Utility Group action item on NRC regional public workshops (mtg 8/21/03)	N – Low I – Low			Obtain industry feedback (industry concerns/recommendations)	I		
FP-6	RCP seals (mtg 6-22-04)	N - ? I - H	Information required to develop position	Generic treatment of issue; delay regulatory action on inspection findings	Staff will consider request for generic treatment	Complete		IN 2005-14

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
FP-7	Containment Oil Misting	N - Med I - ?	Potential non-compliance with III.O, if from RCPs. Two plants Ginna and Waterford affected as RCPs. Two plants Ft. Calhoun and San Onofre may be other oil source		Industry to survey and report		?	
FP-8	Mrule consideration of fire	N-High I-?	Maintenance Rule evaluations should consider fire risk		Prepare industry position		?	

Inspections and Self-Assessments

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/SA-3	Information Notice on triennial results	N – High I - Low	Preparing	None	Complete IN	N		
I/SA-4	Determine feasibility of developing Performance Indicator for Fire Brigades	N - Low I - Low		NRC Considering SDP		N		

Manual Actions

MA-1	<i>Draft feasibility criteria handed out at October 17 meeting</i>	<i>N – High I - High</i>				Complete		<i>October 17 NRC handout on manual actions feasibility criteria FR 66501 NEI Itr 1/27/04 SECY 03-100 and corresponding SRM</i>
MA-2	<i>Enforcement discretion for manual actions inspection findings</i>	<i>N – High I - High</i>				Complete		<i>SECY 04-0233 and corresponding SRM FRN Vol. 70 No. 43 pg 10901</i>
MA-3	Alternate shutdown manual actions	N – High I - Med	Proposed rule issued; public comment received. NRC will evaluate and provide position in final rule	Same feasibility criteria as IP 71111.05T (March 2003) should apply	Proposed rule issued; public comment received. Final rule in development	N	2006	FRN Vol. 70 No. 43 pg 10901 NEI Itr 5/23/05

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

INDUSTRY/NRC FIRE PROTECTION ISSUE MANAGEMENT TRACKING LIST
Active Items - Draft 5 - July 25, 2005

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsi-bility	Action Due Date	Applicable References
NFPA 805/10 CFR 50.48(c)								
805-3	Processing of licensing basis issues (how issues are to be handled during transition) for licensees adopting NFPA 805 (issue needs more definition)	N - High I - High	Addressed in 69 FR 33685 and DG-1139	Addressed in public comments on DG-1139 (NEI #4). More details required in DG-1139 and/or NEI 04-02	To be included in NEI 04-02 and NRC R.G.	N, I	Nov 2005	DG-1139, NFPA 805, 69 FR 33685, NEI 04-02
805-8	NRC issue final reg guide for adoption of NFPA 805 licensing basis (specific issues are tracked individually)	N - High I - High	Minimize RG content - include guidance in NEI 04-02	Agree with NRC position; RG should fully endorse NEI 04-02	NRC to Complete RG <i>Address ACRS Comments</i>	N	Nov 2005	DG-1139, NEI 04-02
Circuit Failure								
CF-7	Release report on NEI 00-01 pilots to NRC	N - Med I - Low			Determine if summary of report can be provided in the near future			NEI follow up.
CF-8	RIS for clarification of circuit analysis terms	N - High I - Low	Positions stated in RIS	Varies	Incorporate stakeholder comments and finalize RIS NRC proposed RIS to address endorsement of NEI 00-01 for non-805 plants. RIS 2005-03 provides endorsement for 805 plants. RG to address.	N		Draft RIS ML051110160
CF-9	Additional clarification of circuit analysis terms	N-High I-low	Additional issues may require clarification		Public meeting planned. NRC to determine if additional clarifications are needed	N	Fall 2005	Proposed generic communication to address "one-at-a-time."
Fire Barrier Issues								

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
FB-4	Generic communication on Hemyc/MT test results	N- High I-?	NRC will collect information regarding Hemyc/MT and licensees will act to ensure compliance is met		NRC to issue draft generic communication on Hemyc/MT	N	July 2005	Fire protection web site has been updated with applicable references. FRN published July 25 for public comment – due Sept 23 ML051990212
Other Fire Protection Issues								
FP -1a	CO2 System Lockouts	N-Med I-Low			NRC to respond to NEI white paper Review NRC comments and determine if further action is warranted		Fall 2005	<i>NRC comment issued July 20 ML05174005</i>
FP-2	Industry response to NRC position on NEI 02-03	N – Med I - Med		Preparing	Complete and submit		Fall 2005	NEI 02-03, Rev 0 NEI to follow up.
FP-4a	Epoxy coating/flame spread	N-Low I-Low			NRC to respond to NEI white paper	N	June 30	
FP-7	Containment Oil Misting	N - Med I - ?	Potential non-compliance with III.O, if from RCPs. Two plants Ginna and Waterford affected as RCPs. Two plants Ft. Calhoun and San Onofre may be other oil source		Industry to survey and report NRC to provide specifics I – Review RIV white paper		Fall 2005	
FP-8	Mrule consideration of fire	N-High I-?	Maintenance Rule evaluations should consider fire risk		NRC to provide specifics		Fall 2005	
FP-9	Fire hydrants grease may cause corrosion				NRC to issue IN	N	Winter 2005/ 2006	
Inspections and Self-Assessments								
I/SA-4	Develop SDP for Fire Brigades	N - MED I - Low	Preparing		Complete draft and provide to industry for comment	N		
Manual Actions								
MA-3	Alternate shutdown manual actions	N – High I - Med	Proposed rule issued; public comment received. NRC will evaluate and provide position in final rule	Same feasibility criteria as IP 71111.05T (March 2003) should apply	Proposed rule issued; public comment received. Final rule in development	N	Winter 2005/ 2006	FRN Vol. 70 No. 43 pg 10901 NEI ltr 5/23/05

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MA – issue related to manual actions

Completed Items – These items will be deleted at the next revision of the tracking list.

INDUSTRY/NRC FIRE PROTECTION ISSUE MANAGEMENT TRACKING LIST
Completed Items - Draft 5 - July 25, 2005

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
NFPA 805/10 CFR 50.48(c)								
805-4	NFPA Implementing Guidance, NEI 04-02, Rev 0 (specific issues are tracked individually)	N - High I - High	Complete NEI 04-02 expeditiously to support industry adoption of NFPA 805 licensing basis	Will address NRC comments on Rev F of NEI 04-02; Maximize content of NEI 04-02, minimize DG-1139 content	Submit Rev. 0	Complete		ML051430568
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/A	SECY 04-0050 issued			Complete		SECY 04-0050
805-7	NRC response to public comments on DG-1139	N -High I - High	Staff preparing response; public meeting to discuss draft responses on 1/26/05		Formally issue responses (SOC)	Complete?	???	Comment/Response handout for 1/26/05 mtg ML050480240
Circuit Failure								

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
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 - High I - High	Developing. Letter at Division Director level, expected out shortly. CF workshop expected September 8-9	Requested	Response to NEI letters Schedule July meeting to discuss issue prior to workshop in September NEI 001-01, Rev. 1 finalized and sent to NRC Jan 2005.	complete		NEI letters 4/09/03 & 5/22/03 SW email 2/11/04
CF-4a	<i>Circuit inspections</i>	<i>N - High I - High</i>	<i>Preparing for resumption of inspections</i>	<i>Must have appropriate SDP in place</i>	<i>Develop inspection guidance before associated circuit inspections resume</i>	<i>Complete</i>		<i>Guidance in IP 71111.05 SDP in IMC 0609, Appendix F</i>
CF-4b	<i>Circuit inspections</i>	<i>N- High I - High</i>	<i>Preparing for resumption of inspections</i>	<i>Conduct preparatory self-assessments</i>	<i>Provide Rev L of NEI 04-06</i>	<i>Complete</i>		<i>Sent March 16, 2005</i>
CF-4c	<i>Circuit inspections</i>	<i>N - High I - High</i>	<i>Inspections have resumed</i>	<i>NRC accept self-assessment guidance</i>	<i>Response to Rev L of NEI 04-06</i>	<i>complete</i>		
CF-6	<i>NUREG-1778</i>	<i>N -Low I - High</i>	<i>Feedback requested Comments provided</i>		<i>No action</i>	<i>Complete</i>		<i>NUREG-1778 deferred</i>
Fire Barrier Issues								
FB - 1	<i>Hemyc test plan</i>	<i>N - High I - Low</i>	<i>Complete testing arrangements expeditiously. No plans for soliciting further comments on test plan.</i>	<i>Observe/participate in tests. Provide comments on test setup prior to tests.</i>	<i>Complete test plan</i>	<i>Complete</i>		<i>NRC test plan ML051040193</i>
FB-2	<i>Hemyc Testing</i>	<i>N-High I-Low</i>	<i>Complete testing</i>		<i>Complete Testing</i>	<i>Complete</i>		<i>ML051190046 - Hemyc ML051430409 - MT</i>

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
FB-3	Information Notice on Hemyc Results	N-High I - ?	Inform Industry of unexpected test results		Issues IN	Complete		ML050890089
Other Fire Protection Issues								
FP-1	CO2 system lockouts – determine if generic issue (call 10-10-03) – address risk significance	N - Med I - Low	Provided basis. Relatively high risk issue.	Develop white paper	Develop white paper for NRC concurrence before sending to industry	Complete		White paper submitted Jan. 31, 2005
FP-3	Use of fire watches for non-safety compliance issues (mtg 8-21-03)	N – Low I - Med	Determine if compensatory measure white paper will be issued as generic communication	None	Issue position in final form	Complete		RIS 2005-07 - issued
FP-4	Epoxy coatings/flame spread (10/10/03 call)	N – Med I - Low	Provided basis	Preparing summary	Provide letter to NRC with recommendations on issue resolution	Complete	Aug 2005	
FP-5	2003 National Regional Utility Group action item on NRC regional public workshops (mtg 8/21/03)	N – Low I – Low			Obtain industry feedback (industry concerns/recommendations)	Complete		Delete since no on recalls what hti sis about.
FP-6	RCP seals (mtg 6-22-04)	N - ? I - H	Information required to develop position	Generic treatment of issue; delay regulatory action on inspection findings	Staff will consider request for generic treatment WOG issue a tech bulletin	Complete		IN 2005-14
Inspections and Self-Assessments								
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	Complete		Overcome by events - delete
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	Complete		Overcome by event - delete
I/SA-3	Information Notice on triennial results	N – Low I - Low	Preparing	None	Complete IN	Complete		
Manual Actions								

Track-ing #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
MA-1	<i>Draft feasibility criteria handed out at October 17 meeting</i>	<i>N – High I - High</i>				<i>Complete</i>		<i>October 17 NRC handout on manual actions feasibility criteria FR 66501 NEI ltr 1/27/04 SECY 03-100 and corresponding SRM</i>
MA-2	<i>Enforcement discretion for manual actions inspection findings</i>	<i>N – High I - High</i>				<i>Complete</i>		<i>SECY 04-0233 and corresponding SRM FRN Vol. 70 No. 43 pg 10901</i>

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INPO – issue related to INPO

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

MA – issue related to manual actions