

February 16, 2006

MEMORANDUM TO: Sunil D. Weerakkody, Branch Chief  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Daniel Frumkin, Fire Protection Engineer */RA/*  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JANUARY 31, 2006, CATEGORY 1 MEETING WITH  
NUCLEAR ENERGY INSTITUTE ON FIRE PROTECTION ISSUES  
MANAGEMENT PROTOCOL

On January 31, 2006, representatives of Nuclear Energy Institute (NEI) met with the U.S. Nuclear Regulatory Commission (NRC) staff to discuss various fire protection issues summarized in a tracking list dated November 10, 2005 (ML053140107).

New issues discussed during the meeting were as follows:

- 805-9 - Develop tool to deal with changes to NEI 04-02
- 805-10 - NEI to develop peer review guide for NFPA 805 non-pilot plants
- FP-11 - Separation of Instrument Tubing

These issues are included in Enclosure 1. A number of issues were closed during this meeting (see Enclosure 2). The issue of Maintenance Rule, fire protection applications was closed through e-mail correspondence following the meeting (see Enclosure 3).

A summary of the above items and their progress is summarized in the attached matrix. A list of meeting attendees is also enclosed (see Enclosure 4).

Enclosures:

1. Industry/NRC Fire Protection Issue  
Management Tracking List Active Items - Draft 7
2. Industry/NRC Fire Protection Issue  
Management Tracking List Completed Items - Draft 7
3. E-mail closing out the issue of Maintenance Rule
4. Meeting Attendees

CONTACT: Daniel Frumkin, DRA/NRR  
301-415-2280

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ACCESSION NUMBER: ML060460411

OFFICE	AFPB/PFE	PGCB/PM	AFPB/BC
NAME	DFrumkin	QNguyen	SWeerakoddy
DATE	02/16/06	02/16/06	02/16/06

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B. Nijafi (SAIC for EPRI)\*

### **NEI**

A. Marion  
B. Jamar

### **NRC INTERNAL**

J. Lyons  
T. Quay  
S. Weerakkody  
P. Lain  
B. Radlinski  
B. Wolfgang  
A. Klein  
C. Moulton  
M. Salley  
N. Iqbal  
R. Gallucci  
Q. Nguyen  
D. Frumkin

**INDUSTRY/NRC FIRE PROTECTION ISSUE MANAGEMENT TRACKING LIST**  
**Active Items - Draft 7 - January 31, 2006**

Tracking #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
<b>NFPA 805/10 CFR 50.48(c)</b>								
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	NRC will develop RG based on Rev 1	Rev. 1 in with NRC	Develop revised version based on issued identified during pilot plants	I	Dec 2006	Add accs no for 04-02
805-8	NRC issue final reg guide for adoption of NFPA 805 licensing basis	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	Spring 2006	DG-1139, NEI 04-02
805-9	Communication tools for 805 plants	N-High I-High		Need tool similar to IMP to manage issues that come out of pilots, similar to license renewal	NEI to prepare draft	I	Summer 2006	
805-10	The development of Fire PRA Peer Review Guide	N-Med I-Med	To be completed 6 months before 1 <sup>st</sup> non-pilot scheduled to submit. Not conditional on ANS Std	NEI to create peer review guide for FP PRAS	NEI to deliver draft to NRC	I	Winter 06/07	
<b>Circuit Failure</b>								
CF-9	Additional clarification of circuit analysis terms	N-High I-low	Additional issues require clarification		NRC to consider comments/ hold public meeting/ issue GL	N	Comments close 2/6/6	ML051650017
<b>Fire Barrier Issues</b>								
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 generic communication on Hemyc/MT	N	Ongoing	ML051990212 - To discuss in March Meeting
<b>Other Fire Protection Issues</b>								

Tracking #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
FP-7	Containment Oil Misting	N - Med I - Med	Potential non-compliance with III.O, if from RCPs. Two plants have affected RCPs. Two other plants may have other oil source		Industry to survey and report  NRC to provide specifics	I	Summer 2006	
FP-11	Instrument Tubing separation for III.G	N-Low I-Low	How widespread is assumption that instrument tubing is not required to be separate for Appendix R. NRC position is that tubing, if affected by fire, could affect SSD should be protected	NEI will survey to determine extent of assumption	NEI to perform survey	I		is performing a survey, starting 2/2006
<b>Inspections and Self-Assessments</b>								
I/SA-4	Develop SDP for Fire Brigades	N - Low I - Low	Preparing		Complete draft and provide to industry for comment	N		
I/SA-5	Fire Drill Participation	N-Low I-Low	NRC has questions about what counts for drill participation	NEI will survey		I	Late 2006	
<b>Manual Actions</b>								
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	Spring 2006	Public Meeting Early March

## 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**  
**Completed Items - Draft 7 - January 31, 2006**

Tracking #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
<b>NFPA 805/10 CFR 50.48(c)</b>								
<b>Circuit Failure</b>								
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	Complete		
CF-8	RIS for clarification of circuit analysis terms	N - High I - Low	Positions stated in RIS	Varies	Incorporate stakeholder comments and finalize RIS	Complete		ML053360069 RIS 2005-30
<b>Fire Barrier Issues</b>								
<b>Other Fire Protection Issues</b>								
FP -1a	CO2 System Lockouts	N-Med I-Low			NRC to respond to NEI white paper	Complete		ML051740050
FP-2	Industry response to NRC position on NEI 02-03	N – Med I - Med			Complete and submit	Complete		ML032400017
FP-4a	Epoxy coating/flame spread	N-Low I-Low			NRC to respond to NEI white paper	Complete		ML052020025
FP-9	Fire hydrants grease may cause corrosion				NRC to issue IN	Complete	Winter 2005/ 2006	IN 2005-32 ML053110349
FP-10	Site FP Engineers Cleared for Safe-Guards Info		Licensees have the authority to clear FP Engineers since they would appear to have "a need to know." Apparently this is not being done, note various conflicts between security and FP.			Complete		IN 2005-033

Tracking #	Issue/origin	Priority	NRC Position	Industry Position	Next Action	Action Responsibility	Action Due Date	Applicable References
FPX	FP Security Interface		The inspectors observed new security barrier features that may impact the fire protection program by potentially hampering timely deployment of fire equipment, personnel and other fire protection features.			Complete		IN 2005-033
FP-8	Mrule consideration of fire	N-High I-High	Maintenance Rule evaluations should consider fire risk	Revision to NEI 03-06 to incorporate FP into risk management guidance docs		I	Jan 2006	See Feb. 2 Email, included as Attachment 3.
	The development of Fire PRA Peer Review Guide		NRC would like to use the IMP to organize development of peer review guide	NEI to create peer review guide for FP PRAS by 12/31/2006				Moved to 805 Section
<b>Inspections and Self-Assessments</b>								
<b>Manual Actions</b>								

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**From:** Sunil Weerakkody  
**To:** MARION, Alex  
**Date:** 2/2/06 1:03PM  
**Subject:** Closing out the issue on Mantrenace Rule a(4) with respect to fire protection

Alex:

The purpose of this Email is to convey a summary of the discussion we had with you during the public meeting on 01/31. We indicated to you that, it is NRC expectation that licensees consider fire risk among other risk components when they implement a(4) of the Maintenance Rule. We agreed that resolution of this issue must be handled outside of Fire Protection, and through the appropriate branches of NEI and NRR (i.e NRR/DRA/APOB led by Mike Franovich). We have conveyed our thinking on this subject to NRR/DRA/APOB. As such, I suggest that we close out this item on the NEI/NRC issue mgmt protocol list.

Sunil

**cc:** Alexander, Stephen; Franovich, Mike; Frumkin, Daniel; Gallucci, Ray

ENCLOSURE 3

**Mail Envelope Properties** (43E24962.374 : 19 : 1569)

**Subject:** Closing out the issue on Mantrenace Rule a(4) with respect to fire protection  
**Creation Date:** 2/2/06 1:03PM  
**From:** Sunil Weerakkody

**Created By:** SDW1@nrc.gov

**Recipients**

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am (MARION, Alex)

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SDA CC (Stephen Alexander)

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**Expiration Date:** None  
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**MEETING WITH NUCLEAR ENERGY INSTITUTE (NEI)**

**LIST OF ATTENDEES**

**JANUARY 31, 2006**

**NEI**

A. Marion  
B. Jamar

**NRC**

J. Lyons  
T. Quay  
S. Weerakkody  
P. Lain  
B. Radlinski  
B. Wolfgang  
A. Klein  
C. Moulton  
M. Salley  
N. Iqbal  
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R. Wilferd (STARS)\*  
H. Barrett (Duke)\*  
J. Hicks (Progress)\*  
B. Nijafi (SAIC for EPRI)\*

\*participated via telephone