

March 7, 2006

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

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

SUBJECT: SUMMARY OF FEBRUARY 27, 2006, CATEGORY 1 MEETING WITH
NUCLEAR ENERGY INSTITUTE (NEI) 04-02 DEVELOPMENT
TEAM ON NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805
FINAL REGULATORY GUIDE ISSUES

On February 27, 2006, representatives of the NEI 04-02 development team met with the U. S. Nuclear Regulatory Commission (NRC) staff to discuss National Fire Protection (NFPA) 805 final regulatory guide issues (see list of issues and brief summary of each at ADAMS Accession No. ML060530183). The purpose of the meeting was to inform the NEI team of the changes that had been made to the NFPA 805 regulatory guide since its issuance for public comment. The NRC solicited comments on these changes from NEI and other stakeholder participants.

The NEI team commented on specific guidance included in the regulatory guide with respect to the following:

- Risk threshold criteria for self approval of plant changes that affect the fire protection program
- Content of the fire protection licensing basis
- Guidance for combining the risk associated with multiple, related changes
- Reporting requirements for changes with calculated risk that is $1E-7$ /yr for core damage frequency (CDF) but $<1E-6$ /yr for CDF (range for large early release frequency is one order of magnitude less)
- The NRC-proposed changes to NEI 04-02 regarding the quantification of risk during low power and shutdown modes of operation for plant change evaluations
- Peer review requirements for fire probabilistic safety assessment

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415-3174

The NRC agreed to evaluate the NEI and other stakeholder comments for incorporation in the final regulatory guide. It was also suggested that, due to the extent of the changes since the regulatory guide was issued for public comments, the draft final guide should again be issued for public comment. The NRC did not see any additional benefit in pursuing this option, but took the comment into consideration. The NEI team did not think that issuing the regulatory guide for trial use would be beneficial.

The NEI team agreed to further articulate their comments in writing to the NRC staff in approximately two weeks.

A list of meeting attendees is attached to this memorandum.

MEETING WITH NUCLEAR ENERGY INSTITUTE (NEI)

LIST OF ATTENDEES

FEBRUARY 27, 2006

NEI

A. Marion
B. Jamar

NRC

P. Lain
B. Radlinski
S. Weerakkody
A. Klein
C. Moulton
T. Quay
R. Gallucci
Q. Nguyen
D. Frumkin
M. Shuaibi
J. Hyslop
S. Dinsmore
G. Parry
A. Howe
L. Mrowca

OTHER

D. Henneke (Duke)
H. Barrett (Duke)
E. Kleinsorg (Kleinsorg Group)
A. Ratchford (Kleinsorg Group)
J. Ertman (Progress)
B. Najafi (SAIC)
C. Tyler (Winston & Strawn)
S. Dolley (Inside NRC)
V. Rubano (FPL)
K. Heffner (Progress)
K. Zoe (ERIN)
F. Emerson (GE)
I. Heatherly (TVA)
Doreen Mestos*
Flora DePortis*
Nancy Chapman* (Bechtel)

Other members of the public*
*participated via telephone

The NRC agreed to evaluate the NEI and other stakeholder comments for incorporation in the final regulatory guide. It was also suggested that, due to the extent of the changes since the regulatory guide was issued for public comments, the draft final guide should again be issued for public comment. The NRC did not see any additional benefit in pursuing this option, but took the comment into consideration. The NEI team did not think that issuing the regulatory guide for trial use would be beneficial.

The NEI team agreed to further articulate their comments in writing to the NRC staff in approximately two weeks.

A list of meeting attendees is attached to this memorandum.

Adams Accession Number: ML060650527 E:\Filenet\ML060650527.wpd

OFFICE	AFPB/PFE	PGCB/PM	AFPB/BC
NAME	RRadlinski	QNguyen	SWeerakoddy
DATE	03/07/06	03/07/06	03/07/06

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