

May 2, 2006

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

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

SUBJECT: SUMMARY OF MARCH 3, 2006, CATEGORY 3 PUBLIC MEETING  
REGARDING THE NATIONAL FIRE PROTECTION ASSOCIATION  
(NFPA) 805 TRANSITION WORKSHOP

On March 3, 2006, the U.S. Nuclear Regulatory Commission (NRC) staff held a workshop with stakeholders and the public to discuss aspects of transitioning to the new fire protection licensing basis for nuclear power plants, pursuant to Title 10 of the *Code of Federal Regulations* Part 50.48(c) (10 CFR Part 50.48(c)). The following presentations were conducted: Jim Lyons, Nuclear Reactor Regulation (NRR) Director of the Division of Risk Analysis provided short welcoming remarks highlighting the importance to the Commission of this risk-informed regulation and the goal to provide regulatory stability. Sunil Weerakkody, NRR Fire Protection Branch Chief, talked about the purpose of the workshop and the plan to have periodic workshops for plants transitioning to National Fire Protection Association (NFPA) 805 Rule. Paul Lain, NRC NFPA 805 Program Manager provided a discussion on the Utilities sending in their Letters of Intent to transition to NFPA 805 and the NRC's response to those letters.

Next, a panel discussion ensued with short topics presented to spur discussion. Paul Lain discussed a concept to document NRC interim approval of technical advances and updates to the regulatory guide and corresponding NEI implementing guide between revisions. Alexander Klein, NRR Senior Fire Protection Engineer, discussed how recovery actions should be handled under NFPA 805. Robert Wolfgang, NRR Fire Protection Engineer, discussed a generic communication clarifying post-fire safe-shutdown circuit regulatory requirements. Daniel Frumkin, NRR Fire Protection Engineer, discussed the draft generic letter on Hemyc/MT fire barriers. Chris Nolan, Section Chief in the Office of Enforcement, discussed discretion policy for 10 CFR Part 50.48(c). Peter Koltay, Senior Reactor Operations Engineer, discussed the refocused triennial fire protection inspection procedures for plants in transition to NFPA 805. Daniel Frumkin discussed the development of a new Standard Review Plan (SRP) for 10 CFR Part 50.48(c). Finally, the panel discussion ended with Gareth Parry, NRR Senior Advisor for PRA. He discussed the reduction in risk threshold for licensee self approval of changes to the fire protection program. In regard to self-approval guidelines, the NRC staff

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admitted that there was a communication breakdown in the short notice of the change, but asked its stakeholders to only consider the technical merits of the change. Stakeholders appeared to be very interested in processes related to the withdrawal of the operator manual actions rule.

The next phase of the workshop was presentations from the NRC and Industry on the NFPA 805 Pilot Program. Paul Lain discussed the programmatic aspects of the pilot program and documentation of the observation visits through trip reports. Progress Energy discussed their lessons learned from their pilot effort to transition the Shearon Harris Nuclear Power Plant. Duke Power discussed the lessons learned from their pilot effort to transition the Oconee Nuclear Station. Nuclear Energy Institute (NEI) discussed a suggested communication process for tracking issues and forming an NEI NFPA 805 Task Group to represent those licensees transitioning to NFPA 805.

The next presentation topics were the NFPA 805 Regulatory Guide, RG 1.205, and the NEI NFPA 805 Implementation Guide, NEI 04-02. Robert Radlinski, NRR Fire Protection Engineer, went through a comprehensive review of the NFPA 805 fire protection program the featured the key points of RG 1.205 and the NRC's endorsement of NEI 04-02. This was followed by NEI representatives discussing the transition process as featured in the NEI implementation guidance, NEI 04-02.

The NRC staff took the following comments for its consideration:

- Determine the fleet implications and schedule impacts for Generic Letter (GL) responses.
- Concerning the self-approval guidelines, define the technical merits and the NRC staff expectations to avoid communication breakdowns. Clarify the 90-day response period.
- Akin to license renewal, use inspection results to reduce redundancy during amendment review.
- When can Fire Protection Program (FPP) changes use other plant changes to offset cumulative FPP risk increases? Define what constitutes an FPP change.
- Define prior approval of previous GL 86-10 deviations.
- Consider integrating the NFPA 805 change control process under 10 CFR 50.59.

The agenda is attached, the list of meeting attendees and the presentations are in ADAMS, Accession #ML061070482.

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NFPA 805 TRANSITION WORKSHOP  
MARCH 3, 2006  
TWO WHITE FLINT AUDITORIUM  
AGENDA

- 8:00 Welcome
- 8:05 Workshop Purpose & Schedule
- 8:15 NFPA 805 Transition Acceptance
- 8:30 Panel Discussion:  
  
RG/NEI 04-02 Interim Changes (Concept)  
805 Resolution of Major Fire Protection Issues  
(III.G.2 Manual Actions, Multiple Spurious, Hemyc)
- 9:45 Break
- 10:00 Panel Discussion Continued  
  
Enforcement Policy Update  
Inspections During & Post-Transition  
NRC Standard Review Plan (SRP)  
Reduction in Risk Threshold for Self Approval
- 11:30 Lunch
- 12:30 Pilot Program Lessons Learned  
  
Transition Pilot Program  
Multiple Spurious Risk Screening Tool  
Aggregate Review of Deficiencies  
805 Issues Tracking
- 1:45 Break
- 2:00 Reg Guide Structure
- 3:15 Break
- 3:30 NEI 04-02 Implementation Guide
- 5:00 Adjournment