

**SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400/LICENSE NO. NPF-63
FREQUENTLY ASKED QUESTIONS (FAQS), REQUESTING ADDITIONAL
GUIDANCE OR CLARIFICATION REGARDING TRANSITION TO NFPA-805
"PERFORMANCE BASED STANDARD FOR FIRE PROTECTION FOR LIGHT
WATER REACTOR ELECTRIC GENERATING PLANTS"**

NFPA-805 Transition Pilot Plant

FAQ 06-0003

**NFPA-805 Transition Pilot Plant
Frequently Asked Questions
(Template)**

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0003</u>
Submittal Date:	<u>04-25-06</u>	
Licensee Contact:	<u>Jeff Ertman</u>	Tele/email <u>919-546-3681</u>
NRC Contact:	<u></u>	Tele/email <u></u>

Subject

Interpretive Guidance? Yes / No

Proposed New Guidance not currently in NEI 04-02? Yes / No

Details

NEI 04-02 Guidance needing interpretation (include section, paragraph number, and line number as applicable):

NEI 04-02 Section 5.3 and Appendix I.

Circumstances requiring guidance interpretation or new guidance:

Change Question 4.f to "potentially greater than minimal" vs. "greater than minimal" in the change process sheets in Appendix I of NEI 04-02. Also factor risk decreases in to the processes.

Detail contentious points if licensee and NRC have not reached agreement:

NA

Potentially relevant existing FAQ numbers:

NA

Response Section

Proposed Resolution of FAQ and basis for the proposal:

Updated NEI 04-02 Section 5.3 and Appendix I.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

As follows:

Appendix I contains an example of a screening process. The screening process is divided into assessing if the change is trivial (Sections 1.a, 2.a, 3.a) and performing a risk screen in Section 4.0. The risk screen identifies and documents the factors that contribute to the risk associated with the change. In general, these factors include changes in: a) frequency of all fire scenarios which are affected by the change, b) magnitude of expected fires, c) detection capability, d) suppression capability, and e) post-fire capability of plant systems to prevent damage to the core.

The impact of the plant change on each of these factors can be evaluated (either qualitatively or quantitatively) and categorized as: "no" impact, "minimal" impact or "potentially greater than minimal" impact. The nature of the change would enable a licensee to choose among the three categories. A licensee may refer to their IPEEE, the fire protection SDP, or other documents to determine whether the change could have "minimal" or "potentially greater than minimal" impact. The licensee should document the basis for the conclusion. For those changes that do not meet the screening criteria a more detailed Risk Evaluation is required.

If a plant change could cause a "potentially greater than minimal" impact with respect to more than one of the above factors, or could result in a common cause impact on more than one of the above factors (a) frequency of all fire scenarios which are affected by the change, b) magnitude of expected fires, c) detection capability, d) suppression capability, and e) post-fire capability of plant systems to prevent damage to the core), licensees are encouraged to perform risk assessments of the more detailed, quantitative variety.

The preliminary risk screening and risk evaluations should also identify decreases in risk that are associated with the change. Depending upon the nature and magnitude of the decrease, consideration should be given to updating the risk model to account for the decrease.

PRELIMINARY RISK SCREENING

Considering the proposed change, answer the following questions. The nature of the change should enable you to choose among the three categories. Refer to the IPEEE, a plant-specific fire PRA, or other documents to determine whether the change could have "no", "minimal" or "potentially greater than minimal" impact. Document the basis for the conclusion. The potential for common cause effects of a given plant change on the above factors should be considered. For example, an increase in combustible loading in an area can impact all of the factors. See Attachment 3 for examples.

4.0 Can the change be evaluated using a preliminary risk screen?

a. Does the proposed change impact the FIRE FREQUENCY of any fire scenarios affected by the change?

- No Impact
- Minimal Impact
- Potentially Greater than minimal

b. Does the proposed change impact the MAGNITUDE OF THE EXPECTED FIRES for any fire scenarios affected by the change?

- No Impact
- Minimal Impact
- Potentially Greater than minimal

c. Does the proposed change impact the DETECTION CAPABILITY for any fire scenarios affected by the change?

- No Impact
- Minimal Impact
- Potentially Greater than minimal

d. Does the proposed change impact the SUPPRESSION CAPABILITY for any fire scenarios affected by the change?

- No Impact
- Minimal Impact
- Potentially Greater than minimal

- e. Does the proposed change impact the POST-FIRE CAPABILITY OF PLANT SYSTEMS TO PREVENT CORE DAMAGE (including fire affected human actions) during any mode of operation for any fire scenarios affected by the change?
- o No Impact
 - o Minimal Impact
 - o Potentially Greater than minimal

- f. Do any of the risk screening questions have "Potentially greater than minimal" impact, then a detailed quantitative risk evaluation may be required.
- o No. The Fire Protection Program Plant change meets the risk-informed acceptance criteria of NFPA 805 Section 2.4.4.
 - o Yes, a detailed quantitative risk evaluation is required.

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Note: Changes that clearly decrease risk should be identified during the review for potential updates to the risk model.