

FAQ TEMPLATE

Plant: D. C. Cook FAQ # 06-0011 Rev. 0
Submittal Date: 09-28-06
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Distribution: Check all that apply (*NEI Internal Use*)

FPWG RIRWG NSSS OG NFPA 805 TF

Subject:

Interpretation of guidance? *Yes*

Proposed new guidance not in NEI 04-02? *Yes*

Details:

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

NEI 04-02, Appendix B, Section B.2.2., (Page B-7, last paragraph)

Circumstances requiring guidance interpretation or new guidance:

The subject of transitioning Appendix R III.G.3/III.L areas is discussed in Section B.2.2 of NEI 04-02. However, the wording is not entirely clear. Clarification is requested regarding the deterministic transition of areas that currently comply with Section III.G.3 of Appendix R (with or without associated engineering evaluations and exemptions) to NFPA 805 without the need for a change evaluation.

The original intent (based on input from NFPA 805 Committee Members) was that III.G.3 compliant areas could be transitioned as "in compliance with existing plant license basis." This is completely in agreement with the philosophy of safe-today, safe-tomorrow. Per NFPA 805 Figure 2.2 this is considered the "deterministic approach". However, the deterministic approach sections of NFPA 805 Chapter 4, do not appear to specifically address the III.G.3 compliance option. According to NFPA 805 committee members, alternate shutdown was just considered another success path and that was the reason a specific paragraph was not included for III.G.3 in the deterministic approach.

The suggested clarifications to NEI 04-02 are also in line with other parts of NEI 04-02 and Reg. Guide 1.205.

Examples:

From Section 4.3.2 of NEI 04-02, "The deterministic branch of Figure 2.2 of NFPA 805 recognizes the new fire protection licensing basis may include components of the existing plant Fire Protection Program (including approved exemptions / deviations, and correctly implemented 10 CFR 50.59 and Fire Protection Regulatory reviews) that can be shown to comply with Chapters 1, 2 and 4. This would be considered compliance with deterministic compliance in NFPA 805 Chapter 4. Otherwise, additional Fire Protection Regulatory reviews may be used to demonstrate equivalence."

From RG 1.205 Section 2.3, "Section 2.2.7 of NFPA 805 describes the application of existing engineering equivalency evaluations (EEEs) when using a deterministic approach during the transition to an NFPA 805 FPP."

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

N/A

Potentially relevant existing FAQ numbers:

FAQ 06-008 states that alternative shutdown areas transition deterministically in accordance with NEI 04-02 and would not need prior approval.

Response Section

Proposed Resolution of FAQ and the basis for the proposal:

Revise NEI 04-02, Section B.2.2 to address the transition of III.G.3 areas deterministically. Previous analysis has demonstrated the ability to achieve the safe shutdown performance criteria for these areas. Maintaining the philosophy of safe-today, safe-tomorrow, further evaluation is not necessary and a change evaluation should not be required until post-transition changes occur.

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

Revise NEI 04-02, Section B.2.2 (second paragraph) to state the following:

"Transition of a fire area that is governed by Sections III.G.3/III.L of 10 CFR 50 Appendix R is not treated differently than other plant fire areas. While alternative or dedicated shutdown capability was omitted from the deterministic requirements in Chapter 4 of NFPA 805, the transition of a III.G.3 fire area can be completed deterministically given the recovery actions are feasible and the safe shutdown compliance strategy is clearly documented. A change evaluation to address the transition would, therefore, not be necessary. This is consistent with the deterministic approach as depicted in Figure 2.2 of NFPA 805 and is consistent with the safe-today, safe-tomorrow

philosophy. However, the current licensing basis for an alternative/dedicated shutdown fire area may be more explicit than other fire areas, since many licensees have detailed alternative/dedicated shutdown Safety Evaluation Reports. It may require more detailed documentation to ensure future change evaluations accurately capture the baseline configuration. For example, a dedicated shutdown methodology may credit a unique power source or pump that is not part of the plant's safety systems or post-fire safe shutdown program. Post-transition changes to this equipment or methodology would need to be accurately captured for assessment of risk impact."

Deleted: fire area is not different.