

NRCREP - Draft Regulatory Guide DG-1170 - Fire Protection for Nuclear Power Plants**From:** "RILEY, Jim" <jhr@nei.org>**Date:** 11/20/2006 11:55:19 AM**Subject:** Draft Regulatory Guide DG-1170 - Fire Protection for Nuclear Power Plants

November 20, 2006

Chief, Rules and Directives Branch
 Division of Administrative Services
 Office of Administration
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555-0001

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9/22/06

71FR55517

SUBJECT: "Draft Regulatory Guide DG-1170 – Fire Protection for Nuclear Power Plants", November 2006

[1]

The Nuclear Energy Institute (NEI) is submitting this request for a 45-day extension to the comment period for the subject draft regulatory guide.

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In addition, the Commission is currently reviewing a draft generic letter on operator manual actions and post-fire, safe-shutdown circuit analysis multiple spurious actuations. The Commission decision may have significant impact on the content of the subject draft regulatory guide.

James H. Riley
Director, Engineering
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202-739-8137
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[1]

NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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Creation Date Mon, Nov 20, 2006 10:59 AM
From: "RILEY, Jim" <jhr@nei.org>
Created By: jhr@nei.org

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NUCLEAR ENERGY INSTITUTE

James H. Riley
DIRECTOR, ENGINEERING
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November 20, 2006

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: "Draft Regulatory Guide DG-1170 – Fire Protection for Nuclear Power Plants", November 2006

The Nuclear Energy Institute (NEI)¹ is submitting this request for a 45-day extension to the comment period for the subject draft regulatory guide. The additional time is necessary to allow:

1. Evaluation of new guidance on operator manual actions and post-fire, safe-shutdown circuit analysis. The industry and NRC are currently discussing these two issues and positions are evolving.
2. Review of the impact of the new guidance on plants not transitioning to NFPA 805 (*Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants*). This will require a coordinated review between existing licensees and Combined Operating License applicants.
3. Review of the subject draft regulatory guide in relation to the recently published draft of a revision to Section 9.5.1 of the Standard Review Plan (*Fire Protection Program*).
4. Consideration of the implications of DG-1170's guidance for NRC review and approval of proposed PRA methodologies and acceptance criteria. The new guidance does not appear to be consistent with current NRC requirements for other applications of risk tools.
5. Evaluation of DG-1170's definitions of long standing, but previously undefined, terms as compared to existing interpretations and past practices.

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Chief, Rules and Directives Branch

November 20, 2006

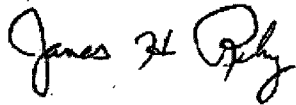
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In addition, the Commission is currently reviewing a draft generic letter on operator manual actions and post-fire, safe-shutdown circuit analysis multiple spurious actuations. The Commission decision may have significant impact on the content of the subject draft regulatory guide.

The comprehensive nature and extensive background associated with the subject of the NRC proposed communication is such that credible and constructive comments from the nuclear energy industry cannot be provided by the requested date noted in the Federal Register. We thank you for your consideration of this request.

If you have any questions regarding this request, please contact me at 202.739.8137; jhr@nei.org or Brandon Jamar at 202.739.8043; btj@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Riley". The signature is fluid and cursive, with the first name "James" being the most prominent.

James H. Riley

c: Mr. Sunil D. Weerakkody, Branch Chief, Fire Protection, NRC
Mr. Jimi T. Yerokun, Branch Chief, Region 1, NRC
Mr. Stephen C. O'Connor, Sr. Project Manager, NRC
Mr. Robert F. Radlinski, Fire Protection Engineer, NRC