

January 4, 2006

MEMORANDUM TO: AFPB File

FROM: Sunil D. Weerakkody, Chief */RA/*
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: CLOSURE OF NATIONAL FIRE PROTECTION ASSOCIATION
805 FREQUENTLY ASKED QUESTION NUMBER 06-0003

Summary of Issue Raised by Frequently Asked Question (FAQ) 06-0003

The Fire Protection Branch (AFPB) has reviewed National Fire Protection Association (NFPA) 805 FAQ Number 06-0003. This FAQ recommends changing the screening acceptance criteria included in Appendix I of Nuclear Energy Institute (NEI) 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.48(c)," Revision 1 and described in Section 5.3.3 of NEI 04-02 from "greater than minimal" to "potentially greater than minimal." The FAQ also recommends that risk decreases be considered in the screening process.

FAQ Proposal

The FAQ proposes to adopt this change by revising Section 5.3 and Appendix I of NEI 04-02. The plant change screening process described in NEI 04-02 specifies a screening criterion of "greater than minimal." The screening criterion will be changed to "potentially greater than minimal" for all of the risk factors identified. Changes that result in minimal or no impact on risk for all of the risk factors identified in NEI 04-02 may be screened out from further risk evaluation.

To address the consideration of risk decrease, the FAQ proposes the addition of the following to Section 5.3.3 of NEI 04-02:

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.

FAQ 06-0003, Revision 1, includes the proposed changes to NEI 04-02, Section 5.3.3 and Appendix I.

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Nuclear Regulatory Commission (NRC) Staff Conclusion

The NRC Staff has reviewed the proposed changes as shown in FAQ 06-0003, Revision 1, and concludes the following:

1. The addition of “potentially” is acceptable since it will require further evaluation of a change before a determination of minimal impact can be made; and
2. Risk decreases may be used to offset fire protection program risk increases when applied in accordance with the guidance in Regulatory Guide 1.205 “Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants” and Regulatory Guide 1.174 “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis,” Revision 1.

Thus the NRC Staff accepts them for use by licensees adopting a performance-based fire protection program and for incorporation into the next formal revision to NEI 04-02.

References

For details regarding this FAQ, please see the following:

- FAQ 06-0003, Revision 0 (4/27/2006) (ADAMS accession number ML061440422)
- FAQ 06-0003, Revision 1 (10/26/2006) (ADAMS accession number ML063170355)
- NEI 04-02, Revision 1 (ADAMS accession number ML052590476)
- NFPA 805, 2001 Edition (available through the Public Document Room or NFPA)
- Regulatory Guide 1.205 (ADAMS accession number ML061100174)
- Regulatory Guide 1.174, Revision 1 (ADAMS accession number ML023240437)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession number ML061660105)

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