

January 4, 2007

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 06-0002

Summary of Issue Raised by Frequently Asked Question FAQ 06-0002

The Fire Protection Branch (AFPB) has reviewed National Fire Protection Association (NFPA) 805 FAQ Number 06-0002. This FAQ recommends changing the sequence of the plant change screening review questions in 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, Appendix I (also discussed in NEI 04-02 Section 5.3) such that the screening process first establishes whether the change affects compliance with either the nuclear safety criteria or the radiological safety criteria of NFPA 805 "Performance-Based Standard for Fire Protection for Light Water Reactor Electrical Generating Plants," 2001 Edition, using the methodology in Chapter 4 of NFPA 805. This step in the screening process determines whether the requirements of Chapter 3 of NFPA 805 must be evaluated for applicability to the change.

FAQ Proposal

The FAQ proposes to adopt this change by revising Section 5.3, including Figure 5.1, and Appendix I of NEI 04-02. The plant change screening process described in NEI 04-02 specifies a determination of NFPA 805 Chapter 3 applicability prior to evaluating the impact on the nuclear safety or radiological safety criteria of NFPA 805. This sequence should be reversed, since a change that does not affect compliance with the nuclear safety or radiological safety criteria does not need to be in compliance with Chapter 3 of NFPA 805.

FAQ 06-0002, Revision 2, includes the proposed changes to NEI 04-02, Revision 1, Section 5.3 and Appendix I.

NRC Staff Conclusion

The staff has reviewed the proposed changes as shown in FAQ 06-0002, Revision 2, and accepts them for use by licensees adopting a performance-based fire protection program and for incorporation in the next formal revision to NEI 04-02.

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## References

For details regarding this FAQ, please see the following:

- FAQ 06-0002, Revision 0 (4/27/2006) (ADAMS accession number ML061440420)
- FAQ 06-0002, Revision 1 (10/26/2006) (ADAMS accession number ML062350109)
- FAQ 06-0002, Revision 2 (11/28/2006) (ADAMS accession number ML063350515)
- 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)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession number ML061660105)

References

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