

FAQ Number 06-0018, Revision 0

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0018 Rev. 0</u>
Submittal Date:	<u>11-6-06</u>	
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NRC Contact:	_____	Tele/email _____

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- FPWG** **RIRWG** **NSSS OG** **NFPA 805 TF**

Subject: Clarification/enhancement of Ignition Source counting guidance for Main Control Board (MCB) in NUREG/CR-6850, supporting NFPA-805 Fire PRA application.

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):

New attachment on interpretation issues

Circumstances requiring guidance interpretation or new guidance:

NUREG/CR-6850, Section 6.5.6

The guidance provided in NUREG/CR-6850 for Task 6, Fire Ignition Frequency, is subject to application inconsistency in the treatment of Main Control Board (Bin 4). The guidance for Task 6 does not provide any specific definition or characterization of what constitutes a Main Control Board (MCB) other than a reference to it being the central element of the room. A discussion amongst the Pilot Plants that included consideration of other plants in their respective fleets found wide variability in the configuration of the main control room. There was a concern that inconsistent treatment of this bin would unnecessarily challenge the completion and review of the Fire PRA. This challenge would be manifested by a notable change in the fire frequency assigned to an individual panel depending on whether it was counted as Bin 4 or Bin 15.

Further review of NUREG/CR-6850 found that a definition of MCB is provided in Appendix L. However, this Appendix develops a fire modeling treatment of fire behavior within a panel enclosure. There was a concern that absent documented agreement, there could be a future challenge to the use of the definition in Appendix L for the purposes of Task 6, Bin 4 counting.

Detail contentious points if licensee and NRC have not reached agreement

This topic has impact on the NFPA-805 pilots, non-pilots and other users of NUREG/CR-6850.

Potentially relevant existing FAQ numbers:

This guidance is specific to the characterization of Main Control Board for Bin 4 determination. The characterization and counting of electrical cabinets for Bin 15 determination is addressed by FAQ 06-0016.

Response Section

It is proposed that the definition of Main Control Board provided in NUREG/CR-6850, Appendix L be accepted as also being applicable for Task 6, Bin 4 counting.

Basis:

The guidance proposed will provide more consistency when determining plant specific control room ignition frequencies while working within the bounds of the exiting data provided by the NUREG. This should facilitate the review and acceptability of the results.