NFPA-805 Transition Pilot Plant Frequently Asked Questions

Plant:	Harris Nuclear Plant (HNP)	FAQ # <u>06-0019 Rev. 0</u>
Submittal Date:	11-30-06	
Licensee Contact:	Alan Holder	Tele/email 919-546-3372
NRC Contact:		Tele/email

<u>Subject</u>

Interpretive Guidance? <u>Yes</u> / No

Proposed New Guidance not currently in NEI 04-02? <u>Yes</u> / No

Details

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

NEI 04-02, Section 4.3.1, Fundamental Fire Protection Program and Design Elements Transition Review, appendices to list acceptable interpretations to the NFPA 805 standard (future).

Circumstances requiring guidance interpretation or new guidance:

Clarification of NFPA-805, Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition), Chapter 3, Section 3.3.1.2 Control of Combustibles. "(1) Wood used within the power block shall be listed pressureimpregnated or coated with a listed fire-retardant application."

Specifically, the definition of "Power Block" and "Plant" and how these will be applied when reviewing Chapter 3 transition.

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

NA

Potentially relevant existing FAQ numbers:

FAQ 06-0007

Response Section

Proposed Resolution of FAQ and basis for the proposal:

This FAQ asks to define, where used in Chapter 3, "power block" and "plant" are intended to mean or are equivalent to, "areas in which a fire could jeopardize the ability to meet the performance criteria described in section 1.5.1".

This is based on RIN 3150-AG48 (Statement of Considerations), which states in part, "under NFPA 805, the 10CFR50.48(a)(2)(iii) requirement to limit fire damage to SSCs important to safety so that the capability to safely shut down the plant is ensured is satisfied by meeting the performance criteria in Section 1.5.1 of NFPA 805", the Chapter 3 applicability is limited to only these SSCs. Therefore for regulatory purposes, the "power block" and "plant" is synonymous with areas in which a fire could jeopardize the ability to meet the performance criteria described in section 1.5.1, Nuclear Safety Performance Criteria.

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

As follows;

Clarification NFPA 805 specific sections as may be applied under NEI 04-02, to be included in (New) Appendix K, to NEI 04-02 upon approval of specific clarification (final formatting to be provided by NEI contract writers).

Specific clarification to NFPA Chapter 3, from FAQ 06-0019,

Where used in Chapter 3, "power block" and "plant" are equivalent to "areas in which a fire could jeopardize the ability to meet the performance criteria described in section 1.5.1, Nuclear Safety Performance Criteria."