

**NFPA-805 Transition Pilot Plant
Frequently Asked Questions**

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0021 Rev. 0</u>
Submittal Date:	<u>11-30-06</u>	
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NRC Contact:	<u></u>	Tele/email <u></u>

Subject

Interpretive Guidance? **Yes** / No

Proposed New Guidance not currently in NEI 04-02? **Yes** / 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 3.3.5.2, “Only metal tray and metal conduits shall be used for electrical raceways. Thin wall metallic tubing shall not be used for power, instrumentation, or control cables. Flexible metallic conduits shall only be used in short lengths to connect components.”

Specifically, this FAQ asks to clarify that air drops are acceptable. Pilot Plant HNP has exposed cable drops ~ 3’ in length, which are a previously approved configuration.

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 clarifying that air drops are acceptable. “HNP has exposed cable drops ~ 3’ in length.” Because air drops are a typical industry configuration, and for the most part have been identified and approved in facility CLBs there is no need to burden staff or licensees with the need for additional justification or review of such configurations. Likewise, based on the widespread application of airdrops in the industry there is no reason to include submittal of these airdrops as items previously approved when a bounding interpretation will address the configuration.

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 for NFPA 805 section 3.3.5.2, from FAQ 06-0021,
Where used in section 3.3.5.2, the term, “Flexible metallic conduits shall only be used in short lengths to connect components”, shall be considered to be equivalent to “cable air drops of limited length, or as may have been previously approved in the CLB.”