

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

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0023 Rev. 0</u>
Submittal Date:	<u>11-30-06</u>	
Licensee Contact:	<u>A.L. Holder</u>	Tele/email <u>919-546-3372</u>
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 3.3.8, Bulk Storage of Flammable and Combustible Liquids, “Bulk storage of flammable and combustible liquids shall not be permitted inside structures containing systems, equipment, or components important to nuclear safety. As a minimum, storage and use shall comply with NFPA 30, Flammable and Combustible Liquids Code.”***

***Specifically, this FAQ asks to grant exception for Diesel Fuel Oil Day Tanks located within structures containing systems, equipment, or components important to nuclear safety (e.g., Diesel Generator Buildings).***

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 grant exception for Diesel Fuel Oil Day Tanks located within structures containing systems, equipment, or components important to nuclear safety (e.g., Diesel Generator Buildings). Because diesel fuel oil day/ storage tanks are part of the approved and existing design of most nuclear power plants, No exception should be necessary for the current arrangements of bulk diesel fuel oil storage to support emergency diesel driven equipment. Typical plant designs call for installation of diesel fuel oil day / storage tanks inside structures containing systems, equipment, or components important to nuclear safety for the protection of the fuel supplies. These installations have been previously approved as part of the CLB. As such, 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 the arrangement in the industry there is no reason to include submittal 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 3.3.8, from FAQ 06-0023, Where used in Chapter 3, Section 3.3.8, “Bulk storage of flammable and combustible liquids shall not be permitted inside structures containing systems, equipment, or components important to nuclear safety.” No exception will be necessary for the current arrangements of bulk diesel fuel oil storage to support emergency diesel driven equipment.