

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

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0024 Rev. 0</u>
Submittal Date:	<u>11-30-06</u>	
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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 3.3.11 Electrical Equipment, “Adequate clearance, free of combustible material, shall be maintained around energized electrical equipment.”

Specifically, clarify what is “adequate clearance”, and “energized electrical equipment” to be used during reviews associated with 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 clarify the definition of, “Adequate clearance”, and “energized electrical equipment”, where used in Chapter 3. There is no existing fire protection regulatory guidance to readily lend these definitions. Therefore, adequate clearance would be defined as 3’-0” based on similar guidance found in (OSHA) 29CFR1910.303, Subpart S, Electrical. In the case where a plant has existing administration controls for combustible materials “adequate” would be as defined therein (the procedure having been review, approved and based on some degree of previous evaluation, analysis or defined engineering judgment).

Likewise, “Energized Electrical Equipment”, would be defined for the purposes of Chapter 3 transition, to be that equipment identified in Bin 15 of the Fire PRA (ref.: NUREG 6850, Fire PRA Methodology for Nuclear Power Facilities).

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, Chapter 3, from FAQ 06-0024,
Where used in Chapter 3, the term “Adequate Clearance” is defined as, 3’-0” based on similar guidance found in (OSHA) 29CFR1910.303, Subpart S, Electrical.

Where used in Chapter 3, the term “Energized Electrical Equipment”, is defined as, equipment identified in Bin 15 of the Fire PRA (ref.: NUREG 6850, Fire PRA Methodology for Nuclear Power Facilities).