

Response Section

Proposed Resolution of FAQ and basis for the proposal:

This FAQ asks to define minimum acceptable pre-plan scope. Pre-Plan scope and content are described in Appendix A to NFPA 805, (ref.; A.3.4.2, A.3.4.2.1) This guidance clarifies the guidance previously found in regulatory documents such as 10CFR50, Appendix R, Section K, and NUREG 0800. This will generally allow for continued use of the facility's pre-plans while moving towards a standardized format that will ease inspection and development burdens.

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 3.4, from FAQ 06-0025,
As a minimum, the pre-fire plans should include a description of the following:

- Available fire protection systems
- Fire barriers
- Fire doors
- Locked doors
- Inaccessible or limited access areas
- Safe shutdown equipment
- Fire extinguisher locations
- Ventilation capabilities
- Communication equipment
- Radiological hazards
- Special hazards
- Areas subject to flooding

Pre-fire plans should detail radiologically hazardous areas and radiation protection barriers. Methods of smoke and heat removal should be identified for all fire areas in the pre-fire plans. These can include the use of dedicated smoke and heat removal systems or use of the structure's heating ventilating and air-conditioning (HAC) system if it can operate in the 100 percent exhaust mode.

Water drainage methods should be reviewed and included in the pre-fire plan for each area.

Pre-fire plans should also contain at least minimal information on any hazardous materials located in the fire area (i.e., acids, caustics, chemicals).