

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

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0025 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 3.4, Industrial Fire Brigade, section 3.4.2.1, “The plans shall detail the fire area configuration and fire hazards to be encountered in the fire area, along with any nuclear safety components and fire protection systems and features that are present.”

Specifically, define the minimum acceptable scope and content for fire pre-plans.

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 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).