

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

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0026 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 3.4.4, Fire Fighting Equipment, “Protective clothing, respiratory protective equipment, radiation monitoring equipment, personal dosimeters, and fire suppression equipment such as hoses, nozzles, fire extinguishers, and other needed equipment shall be provided for the industrial fire brigade. This equipment shall conform with the applicable NFPA standards.”

Specifically, clarify that the intent of “conform with the applicable NFPA standards”, is for specification and procurement aspects of the equipment.

Detail contentious points if licensee and NRC have not reached agreement:

NA

Potentially relevant existing FAQ numbers:

FAQ #06-0007 & FAQ #06-0020.

Response Section

Proposed Resolution of FAQ and basis for the proposal:

This FAQ asks to clarify that the intent of “conform with the applicable NFPA standards”, as they relate to fire brigade equipment. Applicable NFPA standards are addressed in FAQ #06-0020. Because the NFPA standards related to fire brigade equipment have evolved greatly beyond the CLB for plants, and in light of the fact that nuclear power plant fire fighting equipment is exposed to limited actual field use, it is not reasonable to require some of the maintenance activities and periodicities that are applied to equipment used by municipal fire departments and therefore contained in some NFPA standards. Rather, the industry recognizes and agrees that equipment should be purchased to NFPA standards, in force at the time of purchase. Along with this reasonable care and maintenance of equipment should be determined and implemented based on the actual level of field usage (ref. guidance found in IN-2000-12, Potential Degradation of Firefighter Primary Protective Garments).

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 3.4.4, from FAQ 06-0026,
Where used in section 3.4.4, the term, “conform with the applicable NFPA standards”, is be limited to the specification and procurement of firefighting equipment, and those NFPA standards in effect at the time of purchase for that equipment, care and maintenance will be determined by the licensee based on equipment condition and performance.