

**NFPA-805 Transition Pilot Plant
Frequently Asked Questions
(Template)**

Plant: Harris Nuclear Plant (HNP) FAQ # 06-0007 Rev. 2
Submittal Date: 02-15-07
Licensee Contact: Alan Holder Tele/email 919-546-3372
NRC Contact: _____ Tele/email _____
Title: NFPA 805, Section 3.4.1, Specific Clarification

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.

Circumstances requiring guidance interpretation or new guidance:

Clarification of NFPA-805, Chapter 3 applicability requirements for fire brigades.

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

NA

Potentially relevant existing FAQ numbers:

NA

Response Section

Proposed Resolution of FAQ and basis for the proposal:

Clarification to questions as presented.

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

As follows;

From NFPA-805, Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition)

3.4 Industrial Fire Brigade

3.4.1 On-Site Fire-Fighting Capability. All of the following requirements shall apply.

- (a) A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site. This force shall have a minimum complement of five persons on duty and shall conform with the following NFPA standards as applicable:
 - (1) NFPA 600, *Standard on Industrial Fire Brigades* (interior structural fire fighting)
 - (2) NFPA 1500, *Standard on Fire Department Occupational Safety and Health Programs*
 - (3) NFPA 1582, *Standard on Medical Requirements for Fire Fighters and Information for Fire Department Physicians*

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). Appendix K will be prefaced with the following, which shall be applicable to all future specific clarifications unless specifically excluded.

Appendix K, Specific Clarifications

While recognizing that Regulatory Guide 1.205, Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants, or NEI 04-02, Nuclear Energy Institute, Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c), does not provide interpretations to the standard NFPA 805, there are instances where implementation of the standard does require further specific clarification as to what is an acceptable method or process to the AHJ. These instances are collectively presented in this Appendix, and referenced to the Frequently Asked Question (FAQ) in which they were originally presented during the pilot plant process and subsequent plant transitioning processes.

Specific clarification to NFPA section 3.4, from FAQ #06-0007, it is acceptable to apply the section as:

- 1 NFPA-600 would apply only to plants with a traditional “fire brigade” made up of employees from one or more plant departments.
- 2 NFPA-1500 and 1582 would apply only to those plants which utilize a dedicated “fire department” organization.

Reference in section 3.4.1(a)(1), to “(interior structural fire fighting)” indicates that for interior fire fighting, at a minimum, the licensee shall meet the requirements noted in NFPA 600, Chapter 5, *Industrial Fire Brigades That Perform Interior Structural Fire Fighting Only*. For exterior fire that could jeopardize the ability to meet the performance criteria described in NFPA 805, Section 1.5.1 the licensee shall be able to demonstrate their ability to control and extinguish those fires.