

FAQ 8 - NRC PROPOSAL

PURPOSE

A high-level purpose of NFPA 805, as implemented under the endorsement of 10 CFR 50.48(c), is to clarify how licensees may use the flexibility afforded by 10 CFR 50.48(c)(2)(vii) and 10 CFR 50.48(c)(4) to develop a process to maintain the flexibility available to licensees under Generic Letter (GL) 86-10 evaluations.

DESCRIPTION

10 CFR 50.48(c) requires licensees to submit 10 CFR 50.90 license amendments for any changes to Chapter 3 features of NFPA 805, unless they have been previously approved by the NRC. Under the standard license condition of GL 86-10, licensees are allowed to make certain types of changes without prior NRC approval as long as the changes do not adversely affect the plant's ability to safely shutdown in the event of a fire.

To apply this proposal licensees must send the proposed process/methods outlined in this proposal to the NRC for approval. Then, they may use the approved processes/methods without prior approval for specific applications, as long as the application is within the bounds of staff approval of the proposed methods/processes.

The licensees' proposal must request an amendment under 10 CFR 50.90, using the flexibility available under 10 CFR 50.48(c)(vii) and 10 CFR 50.48(c)(iv) to allow 10 CFR 50.48(c) licensees to establish a process that enables them to make change to Chapter 3 of NFPA 805, as long as those changes only affect the referenced standards and listings, such as Underwriters Laboratory, Inc. or Factory Mutual listings. Under the proposal the licensee will commit to a process to evaluate deviations from secondary codes and listings required by NFPA 805 Chapter 3. The NFPA 805 change evaluation process will be used to ensure that nuclear safety performance goals, objectives and criteria are satisfied along with defense-in-depth and safety margins, as described in 10 CFR 50.48(c)(2)(vii).

Therefore, application of this process/method requires two steps. First, the process/methods and bounds of the process must be submitted to the NRC for approval. Second, following approval by the NRC, all plant specific changes made under this license amendment will undergo the same evaluation process as part of 10 CFR 50.48(c)(2)(vii). This second step, application of the process/method, will not require NRC approval.

This proposal would not apply to NFPA 805 Chapter 3 changes that do not relate to NFPA codes or listings. Changes to other portions of Chapter 3 of NFPA 805 would continue to require individual 50.90 amendments addressing the specific deviation.

PROPOSAL

"License may perform change evaluations for, deviations from the NFPA codes mentioned in NFPA 805, and listings for rated components, without a 10 CFR 50.90 submittal, as long as the specific requirement for the feature is not included in NFPA 805 Chapter 3 itself, and the NFPA 805 change process is used."

JUSTIFICATION

Since this proposal will be approved by the NRC as part of the 50.90 submittal, it will meet the legal requirement of 10 CFR 50.48(c)(2)(vii). The basis for the change evaluation to be included in the 50.90 submittal will be that each individual change will be evaluated against the NFPA 805 change process (nuclear safety requirements, defense-in-depth and safety margins evaluation), and providing this flexibility does not adversely impact the features required by Chapter 3 of NFPA 805 to protect fire safe shutdown at the plant. By only allowing changes to the secondary codes and listings, the changes are bounded. All features required by Chapter 3 will continue to be required. Secondary features may be changed based on an evaluation, using the required methods in a similar manner as is currently allowed under the Generic Letter 86-10 license condition, without prior NRC approval.

CONCLUSION

This proposal will permit, within the bounds of secondary codes and listings, and following NRC approval of a 50.90 amendment, licensees to evaluate fire protection features without prior NRC approval. Other issues not addressed by NFPA codes or listings would have to be submitted for NRC approval on a case by case basis.

EXAMPLE

Section 3.6.1 requires a hose system to be installed per NFPA 14. Using this process/method, a hose system must be available and have access to “all power block buildings,” and must also be a Class III standpipe, but may deviate from other specific requirements of NFPA 14. These deviations must not contradict other text in Chapter 3 of NFPA 805, and the NFPA 805 change process is used.

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SECTION APPLICATION - FAQs that would benefit from this method are listed.

3.3.1.2(1) - Listing for pressure-impregnated or coated with listed fire-retardant wood. - FAQ 06-0019

3.3.1.2(2) - Fire resistance of plastic sheeting - per NFPA 701

3.3.1.2(5) - Controls on combustible and flammable liquids - per NFPA 30 or other applicable NFPA standards

3.3.1.2(6) - Control on use and storage of flammable gases - per NFPA standards - FAQ 06-0020

3.3.1.3.1 - Hot work procedure - per NFPA 51B, NFPA 241

3.3.2 - Structural integrity - per NFPA 220

3.3.3 - Interior finishes - per NFPA 101

3.3.5.1 - Listing of cable for plenum use - FAQ 06-0022 (Partial)

3.3.6 - Roofs - per NFPA 256

3.3.7.1 - Storage of flammable gas - per NFPA 50A

3.3.8 - Bulk storage of flammable or combustible liquids - per NFPA 30 - FAQ 06-0023

3.4.1(a) - On-site fire brigade capability - per NFPA 600, 1500, and 1582 - FAQ 06-0007

3.4.3(a)(1) - Fire brigade training - per NFPA 600 or 1500

3.4.4 - Fire fighting equipment - per applicable NFPA standards - FAQ 06-0026

3.5.1(b) - Flow rate calculation - per NFPA 13 or 15

3.5.2 - Fire water tanks - per NFPA 22

3.5.3 - Fire pumps - per NFPA 20

3.5.10 - Fire main - per NFPA 24

3.5.15 - Fire hydrants - per NFPA 24

3.6.1 - Standpipes - per NFPA 14

3.7 - Fire Extinguishers - per NFPA 10

3.8.1 - Fire alarm - per NFPA 72

3.8.2 - Fire detection - per NFPA 72

3.9.1 - Water fire suppression - per appropriate NFPA standards including 13, 15, 750, and 16

3.10.1 - Gaseous fire suppression - per NFPA 12, 12A and 2001

3.6.3 - Listing of hose nozzles as electrically safe

3.11.1 - Building separation - per NFPA 80A

3.11.2 - Fire barriers - per NFPA 251

3.11.3 - Listing of fire rated door assemblies, fire dampers.

3.11.3 - Fire barrier penetrations per - NFPA 80, 90A, 101

3.11.4 - Listing of fire rated devices for through penetration fire stops.s

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