

Enclosure 1
Trip Summary
Pilot-plant Observation Meeting
November 6 - 9, 2006

NFPA 805 OBSERVATION VISIT TRIP SUMMARY

Date: November 6 – 9, 2006

Location: Progress Energy Headquarters, Raleigh, North Carolina

Attendees: Representatives from the following organizations attended the meetings:

Duke Power	NRC Headquarters
Progress Energy	NRC Region I
Kleinsorg Group	NRC Region II
Nuclear Energy Institute (NEI)	Pacific Northwest National Laboratory (PNNL)
Appendix R Solutions	ERIN Engineering and Research Inc

Subject: Risk-Informed, Performance-Based Fire Protection Transition Pilot-Plant Observation Visit – Raleigh, North Carolina

Agenda: See Enclosure 2

Summary:

A Nuclear Regulatory Commission (NRC) transition pilot-plant Observation Visit for implementation of Title 10 of the Code of Federal Regulations (10 CFR) 50.48(c) was held with representatives from Progress Energy and Duke Power at Progress Energy Headquarters in Raleigh, North Carolina and at the Harris Nuclear Plant. Other utility and industry representatives were also present to observe the proceedings. Progress Energy and Duke Power presented the status for their respective transition projects and specific topics related to 10 CFR 50.48(c) implementation. Enclosure 2 provides the meeting agenda. Enclosure 3 provides the “Parking Lot” issues raised by meeting participants and are documented and tracked by industry as part of the pilot-plant Observation Visits. Presentations given during the meeting is located in ADAMS Accession No. ML063310147. A full trip report will be issued at a later date that includes a more thorough discussion of the agenda topics as well as Issue Summary Sheets that are updated by NRC staff to provides additional information, clarification, and detail on issues raised at this and previous pilot-plant Observation Visits.

Topics Impacting NFPA 805 Implementation:

This Section summarize significant topics of discussion that may have an impact on implementation of 805

Pilot-Plant Fire PRA Peer Review: NRC staff will perform the PRA peer review for the pilot-plants as part of the observation process. Fire PRA methods and results will be used in support of change evaluations during transition and the industry requested NRC input on how

the “in progress” peer review will be performed and documented to provide some degree of certainty in the use of the fire PRA in support of transition activities. Progress Energy provided a “strawman” schedule for Pilot-Plant Observation Visits (Reference 4) that is consistent with their schedule, but will have to be coordinated with the Duke Energy schedule for ONS New **Item 31** created to track.

Pilot-plants identified seventeen NFPA 805 Chapter 3 requirements not addressed in current licensing basis documentation (Reference 12). FAQs may be required to clarify acceptable compliance strategies.

Alternate shutdown (ASD) (i.e., 10 CFR 50, Appendix R, III.G.3) is not specifically addressed in NFPA 805 Section 4.2.3, “Deterministic Approach.” Industry representatives interpret NFPA Figure 2.2 as including all of Appendix R under the deterministic approach. However, Section 4.2.3.1 states that use of recovery actions (i.e., actions taken outside the main control room or remote control stations) to demonstrate availability of a success path for nuclear safety automatically implies use of performance-based approach as covered in Section 4.2.4 to evaluate the additional risk presented by the use of these recovery actions. Pilot-plants expressed concerns that if ASD areas are not transitioned deterministically a significant number of performance based, risk-informed (PB/RI) evaluations will be required. Pilot-plants stipulated that a PB/RI approach requires a change evaluation (see NEI 04-02 Figure 4-3) and that this should not be required if in compliance with III.G.3. The NRC expressed concerns regarding modeling of risk significant operator manual actions as described by the pilot-plants. Parking Lot Items 35 and 36 track this issue.

Chapter 4 work is dependent on resolution of five current outstanding FAQ:

- 06-0004, ADAMS# ML061440430
- 06-0006, ADAMS# ML062350109
- 06-0008, ADAMS# ML062860250
- 06-0011, ADAMS# ML062890271
- 06-0012, ADAMS# ML062860255

Closed Parking Lot Items

This Section provides a brief summary of Parking Lot items that have been closed. Four Parking Lot items were closed. Additional details are available in the Parking Lot to provide information on the actions taken, a summary of the meeting discussions on the specific issues, and whether a FAQ is associated with the item.

- **Item 20** – Closed based on Progress Energy “strawman” schedule (Reference 4). New **Item 31** created to track.
- **Item 25** – Closed due to change in Duke Energy approach
- **Item 26** – To be closed. Expected to be transitioned to FAQ 06-0018 (Reference 21)
- **Item 27** – Closed. Transitioned to FAQ 06-0016 (Reference 19)
- **Item 28** – Closed. Transitioned to FAQ 06-0017 (Reference 20)

New Parking Lot Items and FAQs

This Section provides a brief discussion of new Parking Lot Items and proposed/potential new FAQs

New Parking Lot Items:

Item 31: NRC staff will perform PRA peer review for the pilot-plants as part of the observation process. NRC to provide feedback to Progress Energy on “strawman” 2007 schedule (Reference 4) for interim review of deliverables (in particular, the PRA activities). Duke to provide NRC with PRA schedule information to plan review activities (related to closure of **Item 20**)

Item 32: Pilot-plants identified multiple NFPA 805 requirements not addressed in current licensing basis documentation (Reference 12). This item tracks developing proposed resolution to a requirement for seismic hose stations (NFPA 805 Section 3.6.4).

Item 33: Pilot-plants identified multiple NFPA 805 requirements not addressed in current licensing basis documentation (Reference 12). This item tracks developing proposed resolution to a requirement for suppression for the diesel fire pump (NFPA 805 Section 3.9.4).

Item 34: Pilot-plants identified multiple NFPA 805 requirements not addressed in current licensing basis documentation (Reference 12). This item tracks developing proposed resolution to a requirement for qualified cable (NFPA 805 Section 3.3.5.3).

Item 35: Alternate shutdown (ASD) is not specifically addressed in NFPA 805 Section 4.2.3 under the deterministic approach portion of the standard. However, recovery actions for ASD specifically implies use of performance-based approach as covered in Section 4.2.4. This item tracks resolution of portions of this requirement that pilot-plants felt were confusing.

Item 36: NFPA 805 Section 4.2.4 requires that the additional risk presented by the use of recovery actions be evaluated if their use is what required a performance-based approach. This item tracks resolution of NRC concerns regarding risk significant operator manual actions raised during discussions concerning the need and methods to perform and report this information.

Item 37: This item tracks an industry issue concerning NRC endorsement of ANS Fire PRA standard and potential problems regarding lack of endorsement.

Item 38: Pilot-plants noted the need for information sharing between task force members (details of project status and products) via mechanisms other than Observation Visits.

Item 39: Tracks providing the NRC with access to specific areas of the NEI NFPA 805 webboard.

Item 40: Tracks an issue with using the NEI NFPA 805 webboard to disseminate information and NRC acknowledgement of working level task progress to non-pilot-plants.

New Potential FAQs:

Ten paragraphs from Chapter 3 of NFPA 805 may require new FAQs to clarify their language/requirements (Reference 9, pages 10 - 18). Participants requested that this FAQ also address other items such as mapping of old BTP references (i.e., a tool not a requirement to list) and clarify the table format is not rigid (i.e., database, other report formats are acceptable).

NEI 04-02 Table B-1 Categories. The pilot-plants used additional categories to describe their compliance status (e.g., comply, comply with clarification, complies with previous approval, LAR, further action required, or N/A). An additional FAQ clarify/standardizing the terms used in NEI 04-02 Table B-1 is under consideration.

Duke Energy and Progress Energy made similar changes to the recording and enhancing information in NEI 04-02 Table B-1. A FAQ clarifying the acceptability of alternate (e.g., database) information storage is under consideration, as concerns exist over consistency of final documentation (primarily for non-pilot-plants).

Parking Lot Item 30 notes there is potential confusion over the role of 10 CFR 50.48(a) for a plant that is transitioning to NFPA 805 that may impact the scope of the transition and post-transition program management. A new FAQ is expected to update NEI 04-02 regarding this issue. Also see discussion of FAQ 06-0004 below.

NEI proposed that non-pilot enforcement discretion be extended to allow non-pilot LAR submittal to be 6 months following the first pilot-plant License Amendment Safety Evaluation Report (actions given to NEI Task Force for consideration as a FAQ).

Feedback on Existing FAQs

This Section provides a brief discussion of feedback on existing FAQs discussed during the meeting.

FAQ 06-0004, "Relationship between Chapter 3 and Chapter 4 systems." There are a number of sections of NFPA 805 Chapter 3 that are dependent upon requirements for protection in Chapter 4 (e.g., ERFBS, traditional fire barriers, suppression, and detection). Concerns are that utilities could inadvertently remove defense-in-depth (DID) for systems under consideration based on risk alone. Discussions included a review of the flowcharts for fire protection systems, NFPA 805's definition of DID, and 10 CFR 50.48(c) statements of consideration for information related to general design criteria (GDC) 3 / 10 CFR 50.48(a). NRC will provide comments on FAQ 06-0004 by 11/30/06 and Progress Energy will update FAQ 06-0004 to further address defense-in-depth systems. In addition, a new FAQ is required for Parking Lot Item 30 (Reference 3).

FAQ 06-0016, 0017, and 0018 deal with ignition source counting issues: Progress Energy provided a follow-up from the ONS Pilot in October 2006 concerning ignition source counting issues. Topics included: Draft FAQ 06-0016, "Electrical Cabinet Counting (Bin 15)"; Draft FAQ 06-0017, "High Energy Arcing Faults (Bin 16)"; and Draft FAQ 06-0018, "MCB counting (Bin 4)" (see References 19 – 21). In addition, another FAQ is under development for miscellaneous counting issues. The NRC requested clarification on bounds of the MCC changes (e.g., only applicable to molded case breakers in MCC) in FAQ 06-0016.

It was noted that Chapter 4 work is dependent on resolution of five current outstanding FAQs (06-0004, 06-0006, 06-0008, 06-0011, and 06-0012). ASD operator manual actions (recovery actions) played a role in most of the discussions and will need to be resolved to complete this work. For example, issues surround the need to model ASD recovery actions in the Fire PRA when the recovery actions have existing documentation as to their acceptability.

FAQ 06-0011 may have significant impact on the level of effort required for the pilot-plant transitions. If ASD areas are not transitioned deterministically a significant number of performance based, risk-informed (PB/RI) evaluations will be required. Duke specifically stipulated that a PB/RI approach requires a change evaluation (see NEI 04-02, Figure 4-3) and that this should not be required if in compliance with III.G.3.

Summary of Lessons Learned

This Section provides a summary of lessons learned identified during pilot efforts that may be of value to non-pilots

NEI 04-02 Table B-1 Categories. The pilot-plants used additional categories to describe their compliance status (e.g., comply, comply with clarification, complies with previous approval, LAR, further action required, or N/A). As noted above an additional FAQ clarify/standardizing the terms used in NEI 04-02 Table B-1 is under consideration.

NEI 04-02 Tables B-1, B-2, and B-3 Content versus Format: It was noted by participants that NEI 04-02 Tables B-1, B-2, and B-3 defines content and not format. Pilot-plants found databases are more useful in managing the required information versus strict adherence to a table format. Resolution of this issue may require a FAQ.

Plans for Next Observation Meeting:

Discussions were held on plans for future observation meetings and tentative schedules. Progress Energy provided a "strawman" for a 2007 schedule (Reference 4) for interim review of deliverables (in particular, the PRA activities) and Duke is to provide NRC with PRA schedule information to facilitate planning of review activities. Parking Lot **Item 31** tracks these efforts.

Handout References:

1. NFWA 805 Pilot Observations Meeting, Progress Energy Transition Status, Paul Gaffney, Jeff Ertman, Progress Energy, November 7, 2006 - Meeting Agenda Topic 1.a - Slide Presentation.
2. PE Fire Protection Initiatives Project with NFWA Transition Work Flow, Jeff Ertman, Progress Energy November 7, 2006 - Meeting Agenda Topic 1.b - Slide Presentation
3. PE NFWA 805 Transition Outlook 2007, Jeff Ertman, Progress Energy, November 7, 2006 - Meeting Agenda Topic 1.c - Slide Presentation
4. Strawman Schedule 2007 NRC Harris Pilot Observation Reviews, Jeff Ertman, Progress Energy, November 7, 2006 - Meeting Agenda Topic 1.d - Slide Presentation

5. PE – Hemyc/MT Status, Mike Fletcher, Progress Energy, November 7, 2006 - Meeting Agenda Topic 2.a - Slide Presentation
6. PE – Hemyc Testing Items, Mike Fletcher, Progress Energy, November 7, 2006 - Meeting Agenda Topic 2.b - Slide Presentation
7. Duke Power NFPA 805 Transition Pilot Observation Project Status, Harry Barrett, Duke Energy, November 7, 2006 - Meeting Agenda Topic 3 - Slide Presentation
8. FAQ 06-004, Clarifying the Relationship Between Chapter 3 & 4 of NFPA 805 and Defense-in-Depth, Alan Holder, Progress Energy, November 7, 2006 - Meeting Agenda Topic 5 - Slide Presentation
9. PE NFPA 805 Chapter 3 Transition, Mike Fletcher, Shirelle Johnson, Progress Energy November 7, 2006 - Meeting Agenda Topic 6.a - Slide Presentation
10. Fire Protection Initiatives Project, Project Instruction, FPIP-0120, “NFPA 805 Chapter 3 Fundamental Transition,” Revision 1A Draft, Progress Energy, November 7, 2006 – Meeting Agenda Topic 6.b – Draft Instruction
11. Results of Review – Examples, Mike Fletcher, Progress Energy, November 7, 2006 - Meeting Agenda Topic 6.c - Slide Presentation
12. Chapter 3 sections with no similar NUREG-0800 requirements, Mike Fletcher, Progress Energy, November 7, 2006 - Meeting Agenda Topic 6.d - Slide Presentation
13. HNP Chapter 3 Further Actions Required, Mike Fletcher, Progress Energy, November 7, 2006 - Meeting Agenda Topic 6.e - Slide Presentation
14. Carolina Power & Light Company, Calculation HNP-M/BMRK-0007, “Code Compliance Evaluation NFPA 20 – Centrifugal Fire Pumps”, Progress Energy, November 7, 2006 - Meeting Agenda Topic 6.f – Calculation
15. Oconee NFPA-805 Project, Chapter 3 Initiative, Harold Lefkowitz, Duke Energy, November 8, 2006 - Meeting Agenda Topic 7.a - Slide Presentation
16. Oconee Nuclear Station NFPA 805 Chapter 3 Transition, NEI 04-02 Table B-1, Corey Kinsman, Nexus, November 8, 2006 - Meeting Agenda Topic 7.b - Slide Presentation
17. NFPA 805 Chapter 3 Transition Fire Hazards Analysis Verification, Oconee Nuclear Station, Robert Jackson, Nexus, November 8, 2006 - Meeting Agenda Topic 7.c - Slide Presentation
18. NFPA 805 Pilot Observation Meeting, Fire PRA Ignition Source Counting, Dave Miskiewicz, Progress Energy, Kiang Zee, ERIN, November 8, 2006 - Meeting Agenda Topic 8.a - Slide Presentation
19. FAQ 06-0016, Revision 0a, “Clarification/enhancement of Ignition Source counting guidance for Electrical Cabinets in NUREG/CR-6850, supporting NFPA-805 Fire PRA application,” David Miskiewicz, Progress Energy, November 8, 2006 - Meeting Agenda Topic 8.b - Slide Presentation

20. FAQ 06-0017, Revision 0a, "Clarification/enhancement of Ignition Source counting guidance for High Energy Arcing Faults (HEAF) in NUREG/CR-6850, supporting NFPA-805 Fire PRA application," David Miskiewicz, Progress Energy, November 8, 2006 - Meeting Agenda Topic 8.c - Slide Presentation
21. FAQ 06-0018x, Revision 0a, "Clarification/enhancement of Ignition Source counting guidance for Main Control Board (MCB) in NUREG/CR-6850, supporting NFPA-805 Fire PRA application," David Miskiewicz, Progress Energy, November 8, 2006 - Meeting Agenda Topic 8.d - Slide Presentation
22. Harris Nuclear Plant (HNP) Nuclear Safety Performance Criteria Transition, Kieth Began, Bob Rhodes, Progress Energy, November 8, 2006 - Meeting Agenda Topic 9 - Slide Presentation
23. Duke Power NFPA 805 Ch 4 Transition, Harry Barrett, Duke Energy, November 8, 2006 - Meeting Agenda Topic 10 - Slide Presentation
24. SSA Transition Pre and Post Transition, Steve Hardy, Progress Energy, November 8, 2006 - Meeting Agenda Topic 11 - Slide Presentation
25. NRC Perspective of Pilot-plant Transition, Paul Lain, NRC, November 9, 2006 - Meeting Agenda Topic 12 - Slide Presentation
26. NEI NFPA 805 Task Force, Jim Riley, NEI, November 9, 2006 - Meeting Agenda Topic 13 - Slide Presentation

Enclosure 2
 Trip Summary
 Pilot-plant Observation Meeting
 November 6 - 9, 2006

NFPA 805 Meeting for Harris and Oconee Pilot-plants NRC Observation Meeting Topics and Agenda, Raleigh, NC – November 6 - 9, 2006				
		Topic	Lead Presenter	Topic Notes
Monday November 6	1400 – 1750	Harris Nuclear Plant walkdown for select NRC and industry attendees	N/A	
Tuesday November 7	0830 – 0845	Introductions, Meeting Kickoff	Gaffney	Topic 1, Reference 1
	0845 – 0900	Progress Energy (PE) NFPA 805 Project Status	Ertman	Topic 1, References 1-4
	0900 – 0915	PE – Hemyc/MT Status	Fletcher	Topic 2, References 5-6
	0915 – 0945	Duke NFPA 805 Project Status	Barrett	Topic 3, Reference 7
	0945 – 1000	Break		
	1000 – 1110	Parking Lot Issues		Topic 4, Enclosure 3
	1110 – 1130	FAQ 06-0004 Discussion	Holder	Topic 5, Reference 8
	1300 – 1700	PE NFPA 805 Chapter 3 Topics/Results	Fletcher	Topic 6, References 9-14
Wednesday November 8	0830 – 1130	Duke NFPA 805 Chapter 3 Topics/Results	Lefkowitz	Topic 7, References 15-17
	1130 – 1300	Lunch		
	1300 - 1330	PE Follow-up on Ignition Source Counting Issues	Miskiewicz	Topic 8, References 18-21
	1330 – 1445	PE NFPA 805 Chapter 4 Topics/Results	Began	Topic 9, Reference 22
	1445 – 1500	Break		
	1500 – 1540	Duke NFPA 805 Chapter 4 Topics/Results	Barrett	Topic 10, Reference 23
	1540 – 1600	PE NFPA 805 Data and Process	Hardy	Topic 11, Reference 24
	1600	Wrap-up		

**NFPA 805 Meeting for Harris and Oconee Pilot-plants
NRC Observation Meeting Topics and Agenda, Raleigh, NC – November 6 - 9, 2006**

		Topic	Lead Presenter	Topic Notes
Thursday November 9	0830 – 0845	Introductions/Transition Status	Gaffney Ertman - PE Status Barrett - Duke Status	Topics 1 & 2
Information Sharing Meeting ¹	0845 – 1130	Summary of Results Questions and Answers	Fletcher – HNP Lefkowitz - ONS	Topics 3 – 11 Summary
	1130 – 1300	Lunch		
	1300 – 1400	NRC Perspectives	Lain	Topic 12, Reference 25
	1400 – 1430	NEI Perspectives	Riley	Topic 13, Reference 26

¹ Information Sharing Meeting was open to invited utilities and selected consultants.

Enclosure 3
 Trip Summary
 Pilot-plant Observation Meeting
 November 6 – 9, 2006

NFPA 805 Transition Observation Visit & Information Sharing Meeting Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot							
No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
1	How will Reactor Oversight Process deal with multiple spurious operations? Low significance vs. high significance. Philosophical approach for RI-PB treatment of multiple spurious operations is in NEI 04-02. 'Endorsement' of process will be accomplished via Reg. Guide.	Duke / Progress	ROP (new) / NEI 04-02 Methodology for Expert Panel Update Markup to P. Lain 3/28/06 flowchart Review of MC 0612	March 2007 (HNP Pilot Mtg)	NRC (Paul Lain) presented flowchart for "unevaluated Multiple Spurious operations" on 03/27/06. It included a screening process that included CAP and comp. measure inclusion, and documentation of the issue as a potential URI based upon risk significance.	Concerns and questions were raised about the process and the burden associated with URIs. Look at minor violation questions for MC 0612 – to see if 'potential multiple spurious operation findings' are adequately addressed. 1E-08 threshold for screening. Is it an appropriate value to use and consistent with the ROP? (NEI 04-02, NUREG-6850. RG 1.205) Pilot-plants to provide comments on NRC flowchart and potential changes to NEI 04-02. Pilot-plants to provide Update by March 2007	Potential
2	Consider Fussell-Vesely risk importance criteria for spurious operations in the gray area.					[CLOSED] Refer to previous version of Parking Lot for details.	No
3	Clarify approved/unapproved manual actions for change analysis.						Closed to FAQ 06-0001 and 06-0012 October 2006
4	NRC feedback on high-low pressure interface methodology and other items.						Closed to FAQ 06-0006 October 2006
5	Submittal/approval relative to Fire PRA peer review. Will the peer review be a prerequisite for license amendment submittal / approval.					[CLOSED] Refer to previous version of Parking Lot for details.	No

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
6	Non-power operational modes PRA requirements will be a 'show stopper'.					[CLOSED] Refer to previous version of Parking Lot for details.	No
7	NEI 04-02 needs to be clearer on the relationship between NFPA 805 Chapter 3 and 4 requirements.						Closed to FAQ 06-0004 October 2006
8	Recommend making nuclear safety questions first in screening reviews.						Closed to FAQ 06-0002 October 2006
9	Clean up all change evaluation examples and send to NRC.					[CLOSED to Item 10] Refer to previous version of Parking Lot for details.	No
10	Modify NEI 04-02 to "show the path through" fire area boundary qualification.						Closed to FAQ 06-0008 October 2006
11	Guidance for performing preliminary risk screening.					[CLOSED] Refer to previous version of Parking Lot for details.	No
12	Change Question 4.f to "potentially greater than minimal" vs. "greater than minimal"						Closed to FAQ 06-0003 October 2006
13	How should the screening question be "reviewed" by the PRA engineers?					[CLOSED] Refer to previous version of Parking Lot for details.	
14	Consider having others serve as role of AHJ with respect to prior approval of Ch. 3 anomalies.					[CLOSED to No. 10] Refer to previous version of Parking Lot for details.	
15	Match up NEI 04-02 with RG 1.205 for baseline (Section 2.2 of Draft RG 1.205)						Closed to FAQ 06-0010 October 2006
16	How are interim changes to NEI 04-02 and issues going to be handled administratively?					[CLOSED] Refer to previous version of Parking Lot for details.	
17	Impact of circuit failure draft proposed RIS (May 2005) and Generic Letter (October 2005)					[CLOSED] Refer to previous version of Parking Lot for details.	

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
	Items started at PE Pilot (March 2006)						
18	Format for NEI 04-02 Appendix B NSPA methodology transition process.						Closed to FAQ 06-0013 October 2006
19	Need to provide definitions and examples of related and unrelated changes.						Closed to FAQ 06-0005 October 2006
20	NRC provide any specific needs for "in progress" Fire PRA Peer Review This is relative to NRC stated intent to credit the observation process in instead of a Peer Review.	NRC and Progress	Provide proposed schedule at Nov. 2006 Pilot Mtg for NRC review of PRA task documents (estimated Jan. – Feb. 2007)	11/6/06		11/7/06 Discussion Item closed based on PE 'strawman' schedule for 2007 presented at 11/7/06 meeting. New item 31 (related) created. [CLOSED]	None
21	Reconciliation of different risk acceptance thresholds (RG 1.205, ROP acceptance, MSO acceptance).	Duke / Progress	Table of data and recommendations for change. Create FAQ?	4/30/07		Discussed at Oct. 2006 Pilot Mtg. Guidance will be needed prior to performance of change evaluations.	Potential
22	Update Appendix I of NEI 04-02 to include non-power operational mode change evaluation.	NEI	Create FAQ to provide specific guidance.	05/31/07			Potential
23	Discussion was held over wording related to FPP systems and features for the purposes of an FPP change.						Closed to FAQ 06-0005 October 2006
24	NRC expressed concern over "dividing up" individual changes that are small.						Closed to FAQ 06-0014 October 2006

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
	Items started at ONS Pilot (October 2006)						
25	ONS Fire PRA are based on the fire zones as defined in the FP Program, which are not necessarily based on physical barriers or features that are subject to any rigorous treatment. The discussion with the NRC highlighted concerns with respect to the treatment of such compartment in the Fire PRA and the consistency of that treatment with the guidance provided in NUREG/CR-6850. Questions arose over impact of this approach on other tasks and level of documentation needed to justify this approach.	Duke	Provide clarification on methodology.	TBD		11/7/06 Update Closed due to change in Duke approach. PE will create similar item if issues arise at the PE sites. [CLOSED]	Potential
26	The NUREG/CR- 6850 methodology includes a specific frequency bin for the treatment of the main control board in the Main Control Room (Bin 4 of Table 6-1). While the general description of this board by making Reference to the 'horseshoe', is generally correct, there are control room layout details that create some ambiguity, and the potential to characterize other electrical panels/cabinets as Bin 15. The guidance in NUREG 6850 is not clear enough to result in consistent application.	Duke	Provide clarification on methodology (FAQ?)	11/6/06 (HNP Pilot Mtg.)		High priority	FAQ 06-0018

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
27	NUREG/CR-6850 does not provide explicit guidance for the counting of plant electrical cabinets. Two basic approaches were debated. The Method 1 approach would count each individual electrical cabinet based on the physical boundaries of that cabinet independent of size or length. Method 2 would count electrical cabinets based solely on size.	Duke and Progress	Provide clarification on methodology (FAQ?)	11/6/06 (HNP Pilot Mtg.)		High priority <u>11/8/06 Update</u> FAQ 06-0016 presented at the meeting. [CLOSED]	FAQ 06-0016
28	The overall counting method guidance for switchgears, load centers, unit substations, and bus ducts is not completely clear. The concern is that counting these component types for Bin 16 using the Bin 15 method could result in a fire frequency distribution for HEAFs for switchgears and load centers that is inconsistent with industry experience in that the HEAF on the load centers and load centers would be much more frequent as compared to switchgears. A proposed change to the counting method for this bin is proposed so that the HEAF frequency for low voltage equipment would be weighted to a lesser degree.	Duke / Progress	Provide clarification on methodology (FAQ?)	11/6/06 (HNP Pilot Mtg.)		High priority <u>11/8/06 Update</u> FAQ 06-0017 presented at the meeting. [CLOSED]	FAQ 06-0017
29	Miscellaneous ignition frequency binning issues. Questions arise during ignition frequency counting, such as: o MOV motors o Hydraulic actuators for valves o Transformers.	Duke / Progress	Provide clarification on methodology (FAQ?)	12/31/06		High priority	Potential

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
30	There is potential confusion over the role of 10 CFR 50.48(a) for a plant that is transitioning to NFPA 805. This may impact the scope of the transition and post-transition program management.	Duke	Provide clarification on the role of 10 CFR 50.48(a) with a post-transition fire protection program.	12/31/06		11/7/06 HNP Pilot Discussion Discussion held on information available in promulgation of 10 CFR 50.48(c) on 6/8/04 [ADAMS Accession No. ML041340086]. New FAQ to be issued to update NEI 04-02.	Yes
Items started at PE Pilot (November 2006)							
31	NRC to provide feedback to PE on 'strawman' 2007 schedule for interim review of deliverables (in particular, the PRA activities). Duke to provide NRC with PRA schedule information to plan 'peer review' activities.	NRC / Duke / Progress	Work together on plan for peer review	12/31/06		Added 11/7/06	
32	What to do about the new requirement for seismic hose stations (NFPA 805 Section 3.6.4, considering info in 10 CFR 50.48(c))	Duke / Progress	Provide proposed resolution.			Added 11/8/06	
33	What to do about the new 'requirement' for suppression for the diesel fire pump (NFPA 805 Section 3.9.4).	Duke / Progress	Provide proposed resolution.			Added 11/8/06	
34	What to do about the new requirement for qualified cable (NFPA 805 Section 3.3.5.3, considering info in 10 CFR 50.48(c))	Duke / Progress	Provide proposed resolution.			Added 11/8/06	
35	Need additional discussion on FAQ 06-0011 (ASD area transition). Discussion was held at the 11/8/06 meeting on how an ASD fire area (in particular operator manual actions) transition over. Confusion was voiced over the characterization of ASD fire areas as 'deterministic', while recovery actions are defined in NFPA 805 as 'performance-based'. This issue needs additional clarification.	Duke / Progress	Provide proposed resolution.			Added 11/8/06	

**NFPA 805 Transition Observation Visit & Information Sharing Meeting
Raleigh, NC - November 6 - 9, 2006 – Enclosure 3: Updated Parking Lot**

No	Topic	Assigned To	Actions	Schedule	Action Taken	March/October/November 2006 Discussion	FAQ Action
36	Discussion was held on assessing the risk of recovery actions (operator manual actions) and the need/methods to perform/report this information as part of transition. Reference Section 4.2.4 of NFPA 805. NRC expressed concerns over risk significant operator manual actions.	Duke / Progress				Added 11/9/06	
37	Determine whether the NRC plans to endorse the ANS Fire PRA standard in RG 1.200 or wait for an integrated standard. The impact on non-pilots requiring peer review needs to be understood.	NRC / NEI				Added 11/9/06	
38	Determine information sharing between task force members (details of project / products).	Duke / PE / NEI					
39	Question was raised on allowing the NRC to have some specific access to the NEI NFPA 805 webboard.	NEI					
40	With respect to getting acknowledgment from the NRC, NEI stated that working level task progress could be posted on the NEI Webboard. This could be used to get information out on specific tasks to the non-pilot-plants.	NEI / Duke / Progress					

