



NUCLEAR ENERGY INSTITUTE

James H. Riley
DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

April 13, 2007

Dr. Sunil Weerakkody
Branch Chief, Fire Protection
U.S. Nuclear Regulatory Commission
Mail Stop O11-A11
Washington, DC 20555-0001

Subject: Fire Brigade Drill Participation – NEI/Industry Position Paper

Project Number: 689

Dear Dr. Weerakkody:

During a recent public meeting on fire protection issues management, we agreed to offer an evaluation on defining fire brigade drill participation. The enclosed position paper presents an industry accepted analysis and method of defining fire brigade drill participation, in which the conclusions of the paper are based on the following observations:

- Industry review of NRC guidance documents indicates that clear criteria does not exist that address what role a fire brigade member must play to receive credit for participation in a fire brigade drill.
- Review of industry consensus standards, NFPA 27 and NFPA 600, do not clearly define fire brigade drill participation.
- Industry survey indicates 75% of respondents were providing credit to fire brigade members if the member participated in the drill and critique but did not dress-out.
- Nuclear Electric Insurance Limited (NEIL) confirms that the standard industry practice is to provide fire drill credit for fire brigade members beyond those who dress-out.

With the above information in mind, and in order to establish consistency on this issue, NEI proposes that fire brigade drill participation credit should be given to a fire brigade member if the individual has not dressed-out but has met all of the following:

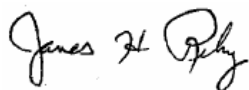
- 1) The fire brigade member understands the drill scenario.
- 2) The fire brigade member engages in a dynamic exercise that demonstrates some aspect of the skill set for a fire brigade member.
- 3) The fire brigade member attends and participates in the post-drill critique session.

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We invite your comments or further discussion in order to close this issue from the NEI/NRC Issues Management Protocol.

If you have any questions, please address them to either me at 202-739-8137; jhr@nei.org or Brandon Jamar at 202-739-8043; btj@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "James H. Riley".

James H. Riley

Enclosure

c: Mr. Daniel Frumkin, Fire Protection Engineer, NRC
NRC Document Control Desk