

May 14, 2007

Ms. Patricia Schroeder
Standards Administrator
American Nuclear Society
Risk-Informed Standards Consensus Committee
555 North Kensington Avenue
LaGrange Park, Illinois 60526

Dear Ms. Schroeder:

On August 10, 2006, the Nuclear Regulatory Commission (NRC) provided public comments on draft American Nuclear Society (ANS) standard, BSR/ANS-58.23, "Fire Probabilistic Risk Assessment Methodology Standard." We are pleased to have an opportunity to comment on the most recent draft version of this standard, released for public review and comment on March 23, 2007.

Quality of probabilistic risk assessment (PRA) is a central issue to risk-informed regulation. A phased approach to PRA quality was developed in SECY-04-0118, "Plan for the Implementation of the Commission's Phased Approach to Probabilistic Risk Assessment Quality," for achieving an appropriate quality of PRAs for risk-informed decisionmaking. An update to the plan is provided in SECY-07-0042. This Fire PRA Standard is crucial to achieving the goals of the phased approach. The Standard will support the NRC staff in performing a more focused technical review of the PRA, resulting in more efficient use of both NRC and industry resources.

The staff has reviewed the subject Standard using our criteria developed in Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," dated January, 2007.

The staff's detailed comments are enclosed. The following is an overall summary of our comments.

- This latest version of the Fire PRA Standard is a substantial improvement over the first version released for public review and comment, and the writing group is to be commended for addressing the comments provided by NRC and others. In particular, improvements have been made in technical areas to enable the integration of this Standard with the ASME Internal Events Standard.
- NRC comments primarily consist of clarifications to the existing requirements, with only a few qualifications aimed at strengthening the requirements. Although NRC encourages ANS to resolve each of these comments during this revision, we recognize that resolution to a few comments may need to evolve as further experience is gained from applying the Standard.

P. Schroeder

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- NRC has focused its review on the main body of this Standard, i.e., Sections 1-7, which constitute the requirements of the Standard and essential supporting material. As a result, we have not reviewed the optional Appendix A, and offer no view on this material.
- This latest version includes extensive discussion notes for explaining the supporting level requirements, thereby reducing the potential for misinterpretation. At this early stage in performing detailed fire PRAs, such extensive discussion is helpful in supporting the Standard's application.

We hope that these comments will assist in the development of the final Standard. It is our intent to continue to support this crucial initiative. If you have any questions, please contact Dr. J.S. Hyslop at (301) 415-6354.

Sincerely,

/RA/

Farouk Eltawila, Director
Division of Risk Assessment and Special Projects
Office of Nuclear Regulatory Research

Enclosure:
As stated

cc: William Burchill, ANS RISC Committee Chair
Dennis Henneke, Fire PRA Standard Working Group Chair
B. Sheron, RES
M. Johnson, RES
J. Dyer, NRR
M. Weber, NRR
J. Grobe, NRR/ADES
R. Borchardt, NRO
G. Holahan, NRO

NRC has focused its review on the main body of this Standard, i.e., Sections 1-7, which constitute the requirements of the Standard and essential supporting material. As a result, we have not reviewed the optional Appendix A, and offer no view on this material.

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DATE	05/10/07	05/11 /07	05/14/07			