

Clarification of "conform with the applicable NFPA standards" in regard to fire fighting equipment, NFPA 805 Section 3.4.4

Summary of issue

Clarification of NFPA-805, Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition), Chapter 3, Section 3.4.4, Fire Fighting Equipment, "Protective clothing, respiratory protective equipment, radiation monitoring equipment, personal dosimeters, and fire suppression equipment such as hoses, nozzles, fire extinguishers, and other needed equipment shall be provided for the industrial fire brigade. This equipment shall conform with the applicable NFPA standards."

Specifically, clarify that the intent of "conform with the applicable NFPA standards", is for specification and procurement aspects of the equipment

Proposed Resolution of FAQ and basis for the proposal

This FAQ asks to clarify that the intent of "conform with the applicable NFPA standards", as they relate to fire brigade equipment. Applicable NFPA standards are addressed in FAQ #06-0020. Because the NFPA standards related to fire brigade equipment have evolved greatly beyond the CLB for plants, and in light of the fact that nuclear power plant fire fighting equipment is exposed to limited actual field use, it is not reasonable to require some of the maintenance activities and periodicities that are applied to equipment used by municipal fire departments and therefore contained in some NFPA standards. Rather, the industry recognizes and agrees that equipment should be purchased to NFPA standards, in force at the time of purchase. Along with this reasonable care and maintenance of equipment should be determined and implemented based on the actual level of field usage (ref. guidance found in IN-200012, Potential Degradation of Firefighter Primary Protective Garments).

NEI proposed wording

Where used in section 3.4.4, the term, "conform with the applicable NFPA standards", is to be limited to the specification and procurement of firefighting equipment, and those NFPA standards in effect at the time of purchase for that equipment, care and maintenance will be determined by the licensee based on equipment condition and performance.

Staff Response

The staff does not agree with the proposal that: "conform with the applicable NFPA standards" be limited to "specification and procurement", and that "care and maintenance" be determined by the licensee based on equipment condition and performance.

Deviations from these NFPA standards should use the Fire Protection Engineering Analysis process/method outlined in the resolution of FAQ 06-0008.

Consequently, the staff suggests that FAQ # 06-0026 be withdrawn.