

Dan, please see attached per your request.

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From: BELL, Denise On Behalf Of MARION, Alex  
Sent: Tuesday, May 02, 2006 3:08 PM  
Subject: FAQ for Licensees Who Choose To Transition to 10 CFR 50.48(c)

May 2, 2006

Dr. Sunil Weerakkody  
Chief, Fire Protection  
U.S. Nuclear Regulatory Commission  
Mail Stop O-11-A-11  
Washington, DC 20555-0001

SUBJECT: Process for Frequently Asked Questions (FAQ)

PROJECT: 689

Dear Dr. Weerakkody:

We are requesting NRC consideration of establishing a process for addressing and posting frequently asked questions for licensees who choose to transition to 10 CFR 50.48(c). A similar process is currently in place for questions related to the Reactor Oversight Process Performance Indicators. This process has been successful in providing guidance and clarification for the quarterly reporting of performance indicators. We would like to build upon this success in applying a similar process for this important transition from the current licensing framework to the risk-informed, performance-based framework provided by

10 CFR 50.48(c).

A proposed explanation of the process is enclosed for your review. If you have any questions, please contact me at 202.739.8080; [am@nei.org](mailto:am@nei.org) or Brandon Jamar at 202.739.8043; [btj@nei.org](mailto:btj@nei.org).

Sincerely,

Alexander Marion

Enclosure

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**Mail Envelope Properties** (445A4DA6.E70 : 16 : 36464)

**Subject:** FW: FAQ for Licensees Who Choose To Transition to 10 CFR  
50.48(c)

**Creation Date** Thu, May 4, 2006 2:51 PM  
**From:** "JAMAR, Brandon" <btj@nei.org>

**Created By:** btj@nei.org

**Recipients**

nrc.gov  
OWGWPO02.HQGWDO01  
DXF1 (Daniel Frumkin)

**Post Office**

OWGWPO02.HQGWDO01

**Route**

nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
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**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

Attachment 1:



NUCLEAR ENERGY INSTITUTE

**Alexander Marion**  
SENIOR DIRECTOR, ENGINEERING  
NUCLEAR GENERATION DIVISION

May 2, 2006

Dr. Sunil Weerakkody  
Chief, Fire Protection  
U.S. Nuclear Regulatory Commission  
Mail Stop O-11-A-11  
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Sincerely,

A handwritten signature in black ink that reads "Alex Marion". The signature is written in a cursive, flowing style.

Alexander Marion

Enclosure

c: Mr. P. Lain, U.S. Nuclear Regulatory Commission

## NFPA 805 FREQUENTLY ASKED QUESTIONS

### PURPOSE

The Frequently Asked Question (FAQ) process is the mechanism for resolving interpretation issues with NEI 04-02 “Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48 (c).” They represent NRC approved interpretations of the guidance for voluntary licensee transition to risk-informed, performance based fire protection. They should be treated as an extension of NEI 04-02.

There are several reasons for submitting a FAQ:

1. *To clarify the guidance for circumstances not anticipated when the current revision of NEI 04-02 was endorsed.*
2. *To clarify the guidance when the licensee and NRC staff do not agree on the meaning or how to apply the guidance to a particular situation.*
3. *To provide guidance for a class of plants whose design or system functions differ from that described in the guidance.*
4. *Proposed changes to the guidance.*

The FAQ process is not the arena in which to resolve interpretation issues with any other NRC regulatory documents. In addition, the FAQ process is not used to make licensing or engineering decisions. In addition, it is not the vehicle for requesting guidance changes to NFPA 805.

### PROCESS

#### 1. Issue identification

Either a licensee or the NRC may identify the need for an interpretation of the guidance. FAQs should be submitted as soon as possible once the need is identified.

The licensee submits the FAQ by email to [help@nei.org](mailto:help@nei.org). The email should include “FAQ” as part of the subject line and should provide the name and phone number of a contact person.

## 2. Expeditiousness, Completeness and Factual Agreement

It is incumbent on the licensee and the NRC to work expeditiously and cooperatively, sharing concerns, questions and data in order that the issue can be resolved quickly. Where possible, agreement on the factual elements of the FAQ should be achieved prior to submittal. The FAQ must describe the situation clearly and concisely and must be complete and accurate in all respects. If agreement cannot be reached on the wording of the FAQ, NRC will provide its alternate view to the licensee for inclusion in the FAQ.

## 3. FAQ Format

See Figure XX for the format for submitting an FAQ. It is important to provide contact information. The question section of the FAQ should include the specific wording of the guidance which needs to be interpreted, the circumstances involved, and the specific question, the proposed new guidance and the applicable section of NEI 04-02. All relevant information should be included and should be as complete as possible. Incomplete or omitted information will delay the resolution of the FAQ. The licensee also provides a proposed response to the FAQ. The response should answer the question and provide the reasoning for the answer. (There must not be any new information presented in the response that was not already discussed in the question.). The FAQ should include proposed wording to revise the guidance in the next revision.

## 4. Screening of FAQs

FAQs are reviewed by NEI and revision to the wording may be requested. After acceptance by NEI, the FAQ is reviewed by the industry's NFPA 805 Task Force. However, during the pilot phase of the implementation of NFPA 805, FAQs identified at one of the pilot plants do not need to be reviewed by the task force. Additional wording may be suggested to the licensee. In some cases, the task force may conclude that the FAQ is without merit and may recommend that the FAQ be withdrawn. An accepted FAQ is entered in the FAQ log which includes all unresolved FAQs. The FAQ log is maintained by NEI. The log, including the questions and proposed responses, is forwarded to NRC and industry task force members to review.

## 5. Public Meeting Discussions of FAQs

The FAQ log is reviewed at each NFPA 805 task force meeting or teleconference, and the Industry/NRC task force is responsible for achieving a consensus response, if possible. In most cases, the licensee is expected to present and explain the details of its FAQ. Licensee and resident/regional NRC staff are usually available (at the meeting or by teleconferencing) to respond to questions posed by the Industry/NRC task force. The new FAQ is introduced by the licensee to ensure the task force understands the issues, but discussion of the FAQ is usually deferred to the next meeting, when participants will have had an opportunity to research the issues involved. At subsequent meetings, the FAQ will be discussed in detail, until all of the facts have been resolved and consensus has been reached on the response. The FAQ will then be considered “Tentatively Approved,” and one additional month will be allowed for reconsideration. At the following meeting the FAQ becomes “Final.” Typically, a FAQ is introduced one month; the facts are discussed for another month and a tentative decision reached; and it goes final the following month.

In some limited cases (involving an issue with no contention and where exigent resolution is needed), it is possible for the NFPA 805 task force to reach immediate consensus and take the FAQ to Final; however, this will be the exception.

## 6. Incorporation of FAQs

Once approved by NRC, the accepted response will be posted on the NRC Website and is treated as an extension of NEI 04-02.

At the time of a revision of NEI 04-02, active FAQs will be reviewed for inclusion in the text. These FAQs will then be placed in an “archived” file. Archived FAQs are for historical purposes and are not considered to be part of NEI 04-02.

FAQs, including those that were reviewed but not incorporated into the text of NEI 04-02, will be listed in the revision record of the guidance.

FAQs and responses are posted on the NRC Website ([www.nrc.gov/NRR](http://www.nrc.gov/NRR)?????????????).



## Figure XX FAQ TEMPLATE

Plant: \_\_\_\_\_  
Submittal Date: \_\_\_\_\_  
Licensee Contact: \_\_\_\_\_ Tel/email: \_\_\_\_\_  
NRC Contact: \_\_\_\_\_ Tel/email: \_\_\_\_\_  
\_\_\_\_\_

Subject:

Interpretation of guidance? Yes or No

Proposed new guidance not in NEI 04-02? Yes or No

### Details

NEI 04-02 Guidance needing interpretation (include section, paragraph number, and line number):

Circumstances requiring guidance interpretation or new guidance:

If licensee and NRC do not agree on the facts and circumstances explain

Potentially relevant existing FAQ numbers

### Response Section

Proposed Resolution of FAQ and basis for the proposal

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

- > Attached please find HNP-06-074, FAQ Requesting Additional Guidance or
- > Clarification Regarding Transition to NFPA 805 "Performance Based
- > Standard for Fire Protection for Light Water Reactor Electric
- > Generating Plants." If a hard copy is desired or if I can be of
- > further assistance please contact Kelli Voelsing (VNET 751-3057).

>  
>

<<HNP-06-074.pdf>>

- > Kelli Voelsing
- > Senior Engineering and Technical Support Specialist
- > Licensing and Regulatory Affairs
- > Harris Nuclear Plant
- > 919-362-3057
- > [Kelli.Voelsing@pqnmail.com](mailto:Kelli.Voelsing@pqnmail.com)
- >

**Mail Envelope Properties** (44649E8C.0EB : 12 : 8427)

**Subject:** HNP-06-074, FAQ for NFPA 805  
**Creation Date** Fri, May 12, 2006 10:31 AM  
**From:** "Voelsing, Kelli" <Kelli.Voelsing@pgnmail.com>

**Created By:** Kelli.Voelsing@pgnmail.com

**Recipients**

nrc.gov  
TWGWPO02.HQGWDO01  
SDW1 (Sunil Weerakkody)

nrc.gov  
TWGWPO01.HQGWDO01  
CPP (Chandu Patel)  
PWL (Paul Lain)

pgnmail.com  
Matthew.Denny CC (Matthew F. Denny)  
tony.maness CC (Tony Maness)  
David.Miskiewicz CC (David N Miskiewicz)  
Robert.Rishel CC (Robert Rishel)  
Jeffery.Ertman CC (Jeffery Ertman)  
ken.heffner CC (Ken Heffner)  
mike.franklin CC (Mike Franklin)  
Alan.Holder CC (Alan Holder)  
michael.fletcher CC (Michael Fletcher)  
robert.steele (Bob Steele)  
eric.mccartney (Eric McCartney)  
michael.janus (Michael Janus)  
scotty.hinnant (Scotty Hinnant)  
paul.fulford (Paul Fulford)  
dave.conley (Dave Conley)  
george.attarian (George Attarian)  
NRC.Resident (HNP NRC Resident)

exchsmtp.cplc.com  
HNPLicRegProg CC (HNP Lic Reg Prog)

duke-energy.com  
dwhenneke CC  
htbarret CC

msn.com  
andy\_ratchford CC

haifire.com  
ekleinsorg CC

nei.org

btj  
am

**Post Office**

TWGWPO02.HQGWDO01  
TWGWPO01.HQGWDO01

**Route**

nrc.gov  
nrc.gov  
pgnmail.com

exchsmtp.cplc.com

energy.com

duke-

msn.com  
haifire.com  
nei.org

**Files**

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TEXT.htm  
HNP-06-074.pdf  
Mime.822

**Size**

558  
1435  
860657  
1183269

**Date & Time**

Friday, May 12, 2006 10:31 AM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

Attachment 1:



Serial: HNP-06-074  
10 CFR 50.48

Mr. Sunil D. Weerakkody, Fire Protection Branch Chief  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-400/LICENSE NO. NPF-63

FREQUENTLY ASKED QUESTIONS (FAQS), REQUESTING ADDITIONAL  
GUIDANCE OR CLARIFICATION REGARDING TRANSITION TO NFPA-805  
"PERFORMANCE BASED STANDARD FOR FIRE PROTECTION FOR LIGHT  
WATER REACTOR ELECTRIC GENERATING PLANTS"

Dear Mr. Weerakkody:

Attached please find a Frequently Asked Question (FAQ), requesting additional guidance or clarification regarding Transition to NFPA-805 "Performance Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants." This question is submitted in the format discussed during the March 27-30, 2006 Pilot Plant status meeting in Raleigh, North Carolina with representatives of Progress Energy, Duke Energy and the NRC Staff. This FAQ is another portion of the "Parking Lot" Issues identified during that meeting.

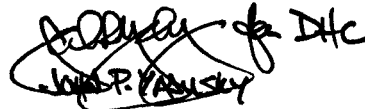
It should be noted that this FAQ is not intended to be used for recommending changes to NFPA-805. It is only intended to be used for clarification of or changes to NEI 04-02, "Guidance For Implementing A Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)." Our understanding is that once approved, FAQs will be considered to be an extension of NEI 04-02 and will be incorporated at the next revision of that document.

Please review the attached FAQ, and advise on the acceptability of the proposed solutions. The guidance and clarifications sought are necessary to support further implementation of the NFPA-805 transition process for our pilot and fleet plants.

Progress Energy Carolinas, Inc.  
Harris Nuclear Plant  
P. O. Box 165  
New Hill, NC 27562

Please refer any question regarding this submittal to Mr. Dave Corlett at (919) 362-3137.

Sincerely,

A handwritten signature in black ink, appearing to read 'DHC' with a stylized flourish.

David H. Corlett

Supervisor – Licensing/Regulatory Programs

DHC/khv

Attachment:

1. FAQ 06-0004

C:

Mr. R. A. Musser, NRC Sr. Resident Inspector  
Mr. C. P. Patel, NRC Project Manager  
Dr. W. D. Travers, NRC Regional Administrator  
Mr. P. W. Lain, Fire Protection Branch  
Mr. A. Marion, NEI  
Mr. B. T. Jamar, NEI

bc:

Mr. G. E. Attarian  
Mr. H. T. Barnett  
Mr. D. T. Conley  
Mr. S. D. Ebnetter  
Mr. D. G. Eisenhut  
Mr. J. Ertman  
Mr. D. M. Franklin  
Mr. J. P. Fulford  
Mr. D. W. Henneke  
Mr. C. S. Hinnant  
Mr. A. Holder  
Mr. K. Heffner

Mr. E. D. Hux  
Mr. M. T. Janus  
Ms. E. K. Kleinsorg  
Mr. R. D. Martin  
Mr. E. A. McCartney  
Mr. H. J. Miller  
Mr. D. Miskiewicz  
Mr. A. Ratchford  
Mr. R. Rishel  
Mr. R. A. Steele  
Licensing Files (2 copies)  
Nuclear Records



SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
FREQUENTLY ASKED QUESTIONS (FAQS), REQUESTING ADDITIONAL  
GUIDANCE OR CLARIFICATION REGARDING TRANSITION TO NFPA-805  
"PERFORMANCE BASED STANDARD FOR FIRE PROTECTION FOR LIGHT  
WATER REACTOR ELECTRIC GENERATING PLANTS"

NFPA-805 Transition Pilot Plant

FAQ 06-0004

**NFPA-805 Transition Pilot Plant  
Frequently Asked Questions  
(Template)**

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0004</u>
Submittal Date:	<u>05-12-06</u>	
Licensee Contact:	<u>Jeff Ertman</u>	Tele/email <u>919-546-3681</u>
NRC Contact:	<u></u>	Tele/email <u></u>

**Subject**

Interpretive Guidance?        Yes / No

Proposed New Guidance not currently in NEI 04-02?        Yes / No

**Details**

NEI 04-02 Guidance needing interpretation (include section, paragraph number, and line number as applicable):

*NEI 04-02 Section 5.3 and Appendix B*

Circumstances requiring guidance interpretation or new guidance:

*NEI 04-02 needs to be clearer on the relationship between NFPA 805 Chapter 3 and 4 requirements. There are a number of sections in Chapter 3 that are dependent upon the requirements for protection in Chapter 4 (e.g., Electrical Raceway Fire Barrier System (ERFBS), traditional fire barriers, suppression, and detection). There is potential for misinterpretation if this is not made clearer.*

*This change essentially defines those Chapter 4 fire protection features that must be met for Chapter 3 requirements. These fire protection features should be risk significant to require placing the items into the Chapter 3 Licensing Basis. Those fire protection features that are not "risk significant" but are credited in PRA must still be able to perform the credited function and, depending upon the risk input, the feature may require monitoring. The risk number (1E-06/year) is consistent with risk precedents defined in the following:*

- Reg. Guide 1.174 (1E-05/year)*
- Proposed License Standard Condition (1E-06/year)*
- NEI-00-01 (1E-06/year)*
- Back-fit Rule (1E-05/year)*
- Proposed Multiple Spurious Operation (MSO) Screening Criteria (1E-06/year)*

Detail contentious points if licensee and NRC have not reached agreement:

NA

Potentially relevant existing FAQ numbers:

NA

## Response Section

Proposed Resolution of FAQ and basis for the proposal:

*Revised NEI 04-02 Section 5.3.2.4 and Appendix B to include more discussion of requirements for protection and flowcharts (in App. B) to assist in determining which systems and features are 'required' by Ch. 4 of NFPA 805. Certain systems, ERFBS, and fire rated barriers may be required to maintain the configurations assumed during the PRA or are necessary for Defense-in-Depth (DID) or Safety Margin (SM). Therefore, "Evaluate for Monitoring" was left in several flow chart sequences (Figures B-1, B-2, and B-3). Monitoring thresholds and criteria will be developed in detail during the Pilot Plant process.*

If appropriate, provide proposed rewording of guidance for inclusion in next revision.

*As follows;*

### 5.3.2.4 Relationship of NFPA 805 Chapters 4 and 3 – Required Systems

It is important to note that there is overlap between the Fundamental Program Elements and Minimum Design Requirements in NFPA 805 Chapter 3 and the protection strategies defined in Chapter 4 of NFPA 805, particularly for fire protection features relied upon to satisfy the nuclear safety criteria of Section 4.2 of NFPA 805. In cases where NFPA 805 Chapter 4 specifies separation or protection methods and Chapter 3 discusses minimum design requirements for the methods, care must be taken to understand whether or not risk-informed, performance-based methods can be used. Examples and clarifications include the following:

- Section 3.11.5, Electrical Raceway Fire Barrier Systems, provides requirements for “ERFBS required by Chapter 4”. The requirements are deterministic in nature and are intended to apply to barriers meeting the Chapter 4 deterministic criteria. If a barrier relied upon for meeting nuclear safety criteria is found not to meet acceptance criteria in Section 3.11.5, then a risk-informed, performance-based change evaluation in accordance with Section 2.4.4 of NFPA 805 is appropriate to assess impact on the nuclear safety capability, rather than a License Amendment Request for approval.
- Note that several sections of NFPA 805, Chapter 3 specify requirements for systems/features that are required to meet the performance-based or deterministic requirements of Chapter 4 (Appendix B-1 provides guidance to determine which fire protection systems are ‘required’ by NFPA 805 Chapter 4.) These limitations are provided in the following sections of NFPA 805:
  - 3.8.2 – Detection
  - 3.9.1 – Automatic and Manual Water-Based Fire Suppression Systems
  - 3.10.1 – Gaseous Fire Suppression Systems
  - 3.11.2 – Fire Barriers
  - 3.11.5 – Electrical Raceway Fire Barrier Systems (ERFBS)

Since many of the fire protection systems/features in NFPA 805 Chapter 3 are the result of meeting the Chapter 4 performance criteria, the change review process should determine the Chapter 4 requirements first in the change identification process.

Completing the cover sheet of the Plant Change Evaluation (Appendix I) and Sections 1, 2 and 3 defines the change being evaluated in terms of the types of evaluations that may be necessary to demonstrate the acceptability of the change.

**Deleted:** It is important to note the restriction to the systems/features required to meet Chapter 4 criteria, in order to not place an unnecessary focus on systems and features that are not required.

**Inserted:** It is important to note the restriction to the systems/features required to meet Chapter 4 criteria, in order to not place an unnecessary focus on systems and features that are not required. These limitations are provided in the following sections of NFPA 805:¶  
3.8.2 – Detection¶  
3.9.1 – Automatic and Manual Water-Based Fire Suppression Systems¶  
3.10.1 – Gaseous Fire Suppression Systems¶  
3.11.2 – Fire Barriers¶  
3.11.5 – Electrical Raceway Fire Barrier Systems (ERFBS)¶  
Since many of the fire protection systems/features in NFPA 805 Chapter 3 are the result of meeting the Chapter 4 performance criteria, the change review process should determine the Chapter 4 requirements first in the change identification process.¶  
5.3.2.5 – Deterministic Requirements – ‘Deemed to Satisfy’¶

**Deleted:** 5.3.2.5 – Deterministic Requirements – ‘Deemed to Satisfy’¶  
NFPA 805 Section 4.1, states that, “Deterministic requirements shall be “deemed to satisfy” the performance criteria and require no further engineering analysis.” Chapter 4 of NFPA 805 provides the requirements for the baseline evaluation of the fire protection program’s ability to achieve the performance criteria outlined in Section 1.5 of NFPA 805. The ‘deemed to satisfy’ with out additional engineering analysis does not imply that a Plant Change Evaluation would not be performed. For example if a licensee was changing its current licensing basis in a fire area to a ‘deterministic method’, that change would require a ‘Plant Change Evaluation’. Note the Defense in Depth and Safety Margin portion of the “Plant Change Evaluation” would be satisfied by the fact that a ‘deterministic’ option was chosen for compliance (See Sections 2.4.4.2 and 2.4.4.3 of NFPA 805).¶

## Appendix B

NFPA 805, Chapter 3 because the NRC had previously approved an alternative compliance strategy. For example, if a licensee uses non-UL listed fire pumps, and this fact had been provided to the NRC during the licensing process and was discussed in the Station's Safety Evaluation Report(s), the previously approved alternative compliance will be carried over to NFPA 805, Chapter 3 as a previously approved alternative compliance. The rationale and documentation used to make the decision should be well documented in the worksheets. Exceptions and clarifications identified during the transition review should be documented in order to provide a well-established baseline for future changes.

Existing Generic Letter 86-10 evaluations, which evaluate deviations from NFPA 805 Chapter 3 requirements, must be submitted to the NRC for approval as a license amendment if they do not meet the License Amendment Request threshold discussed in Section 5.3.2.

Certain Sections of Chapter 3 are only applicable if the fire protection feature is 'required' to meet the performance or deterministic requirements of Chapter 4. Determining if a fire protection feature is required is an iterative process. Figures B-1 through B-3 depict processes that may be used to determine if the requirements of Chapter 3 are applicable to a particular fire protection feature.

Appendix B Flowcharts (revised, added)

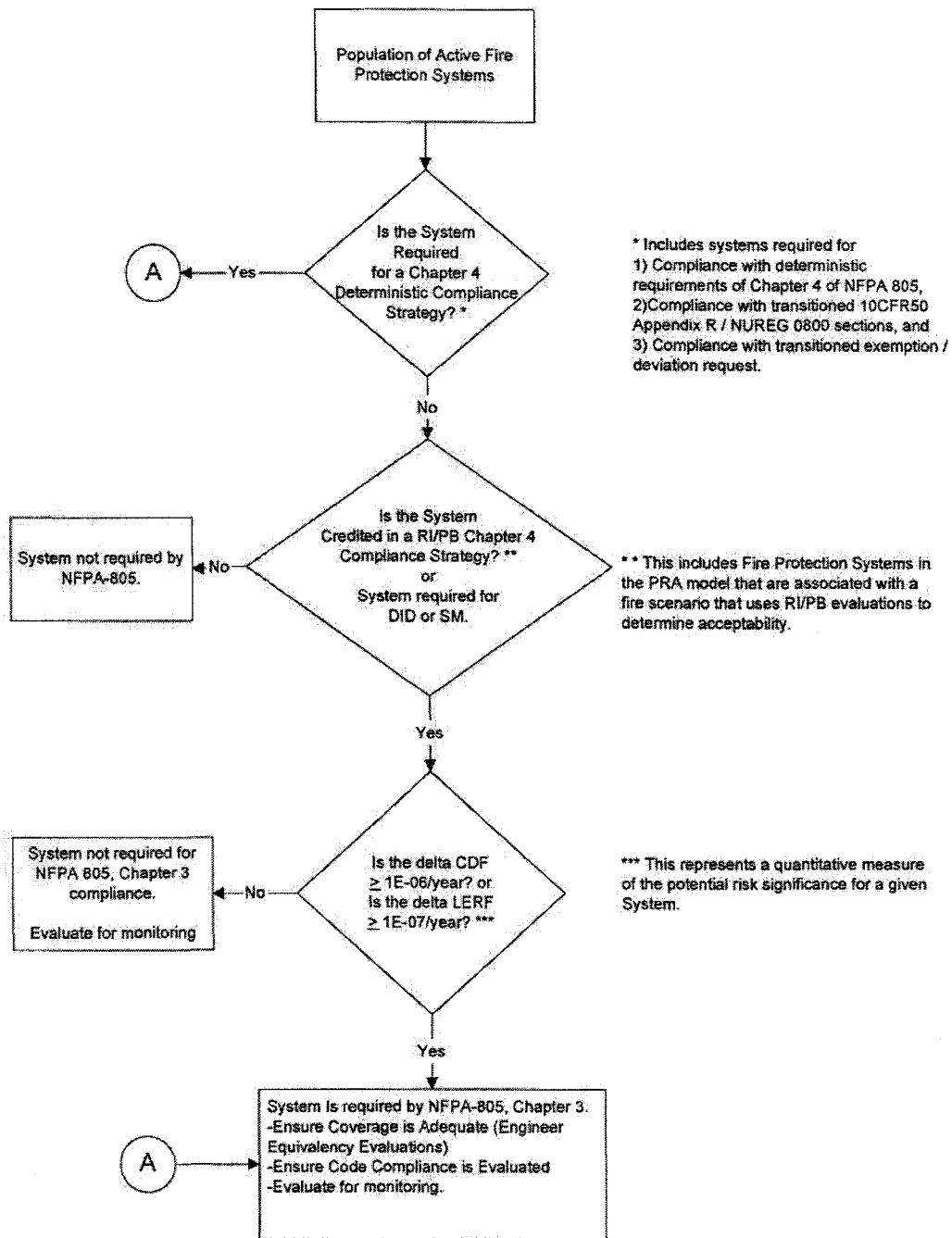


Figure B-1 – Process for Determining if an Active Fire Protection Feature is Required for NFPA 805 Chapter 4 Compliance

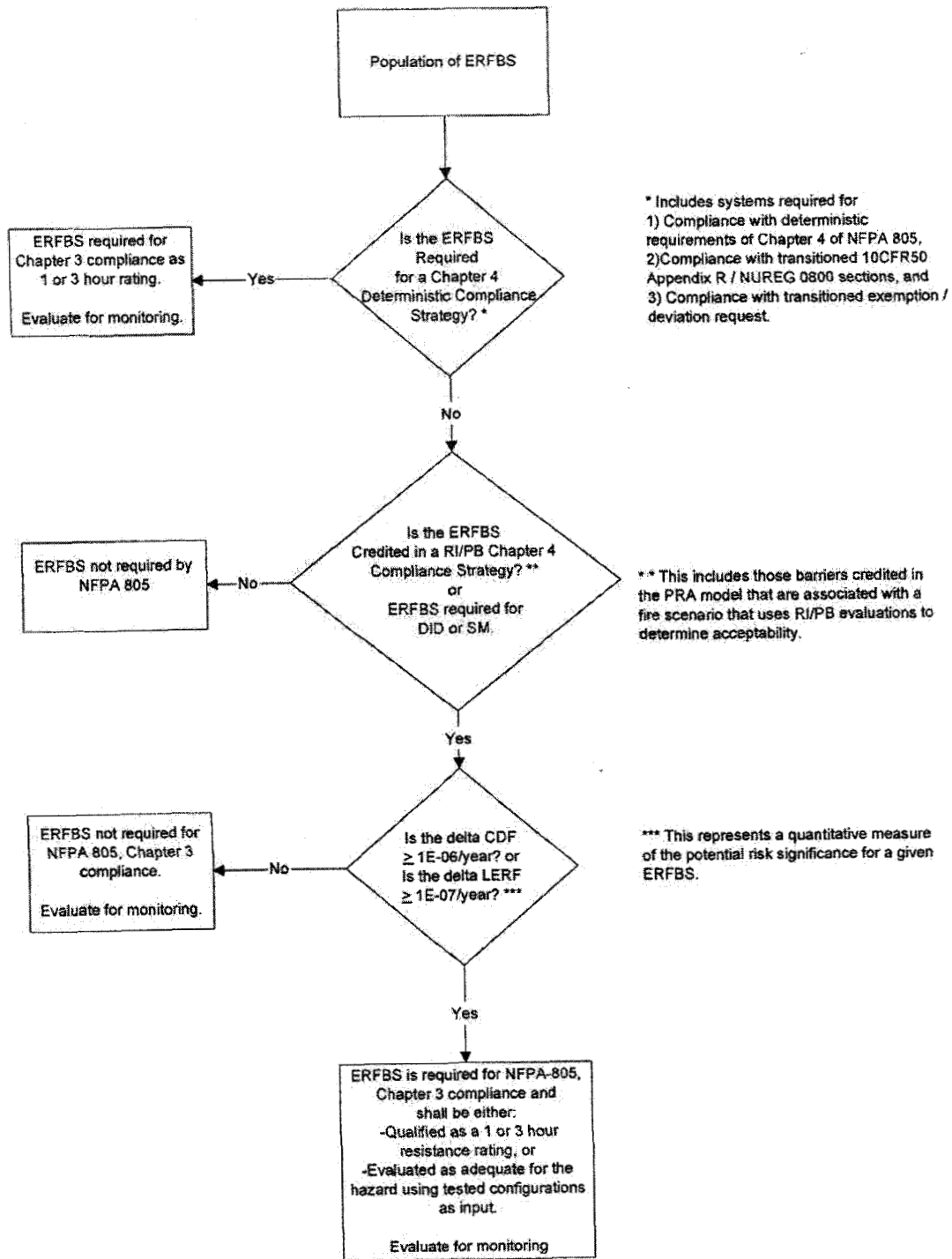
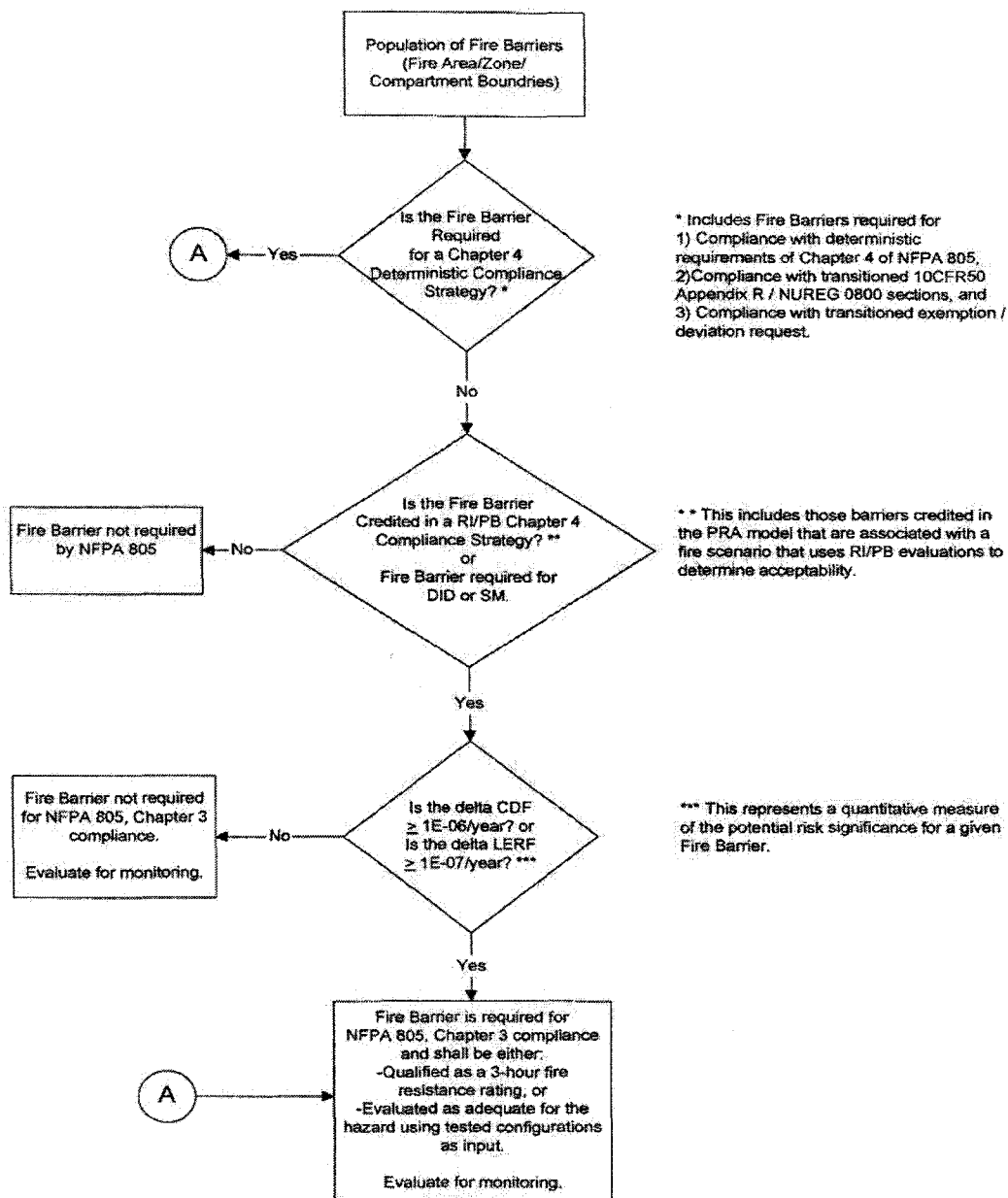


Figure B-2 – Process for Determining if an ERFB is Required for NFPA 805 Chapter 4 Compliance



**Figure B-3 – Process for Determining if a Fire Barrier is Required for NFPA 805 Chapter 4 Compliance**

Included in Table B-1 is the mapping of the Fire Protection Fundamentals for “water supply” for a plant licensed to BTP 9.5-1 APCS, May 1, 1976, Application Docketed but Construction Permit Not Received as of July 1, 1976. This mapping will be done for each section of Chapter 3 of NFPA 805. An example of how a licensee would map over the first 2 sections is provided. Once this mapping is completed all previous commitments will be superseded by compliance with the new rule.