

How are we handling revisions to FAQs? Should they be submitted as a new FAQ, or do we restart the review and approval timeline?

Thanks,

Brandon

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**Mail Envelope Properties** (44D78165.F56 : 23 : 44886)

**Subject:** FAQ question  
**Creation Date** Mon, Aug 7, 2006 2:07 PM  
**From:** "JAMAR, Brandon" <btj@nei.org>

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

**Recipients**

nrc.gov  
CEM4 (Charles Moulton)  
PWL (Paul Lain)  
QTN (Quynh Nguyen)

**Post Office**

**Route**  
nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	760	Monday, August 7, 2006 2:07 PM
TEXT.htm	3113	
Mime.822	6529	

**Options**

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

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

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User  
Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled

Brandon,

In my opinion, how revised FAQs are handled depends on a) the extent of a revision and b) the timing of the distribution of the revision to the stakeholders (i.e. how far in advance of the monthly meeting the NRC gets the revision (for Industry generated FAQs)). It seems unlikely that a FAQ that sees a major revision will be able to move to Tentatively Approved status at the first meeting after its revision. In any case, I don't think that resubmittal as new FAQ would be necessary unless, with the revision, the FAQ is somehow a new issue for all parties. Restarting the time line, or going back to the beginning of the consensus phase, would be preferable.

Chuck

Charles Moulton  
Fire Protection Engineer  
NRR/DRA/AFPB  
Phone: 415-2751  
Mailstop: O11A11

>>> "JAMAR, Brandon" <[btj@nei.org](mailto:btj@nei.org)> 8/7/2006 2:07 PM >>>  
How are we handling revisions to FAQs? Should they be submitted as a new FAQ, or do we restart the review and approval timeline?

Thanks,

Brandon

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transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message.

**Mail Envelope Properties** (44D87D7D.B4A : 12 : 9706)

**Subject:** Re: FAQ question  
**Creation Date** 8/8/2006 8:03:09 AM  
**From:** Charles Moulton

**Created By:** CEM4@nrc.gov

**Recipients**

nei.org  
btj (Brandon JAMAR)

nrc.gov  
PWL CC (Paul Lain)

nrc.gov  
SDW1 CC (Sunil Weerakkody)

**Post Office**

**Route**  
nei.org  
nrc.gov  
nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2625	8/8/2006 8:03:09 AM

**Options**

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

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

**Junk Mail Handling Evaluation Results**

Message is not eligible for Junk Mail handling  
Message is from an internal sender

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User  
Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled

In a phone conversation last week with Chuck I indicated that I would be sending the next round of new FAQs (see attached). This is being sent in an effort to give you advance review prior to our next meeting.

Also attached is a tentative contact list of NFPA 805 Task Force members that plan on participating in the public meeting (as requested). Highlighted names indicate participation in the call. Note: this list reflects the most current feedback that I have received.

We have a task force meeting (telecon) from 1:00 - 2:00 p.m. on Thursday. I plan on bridging all of these participants to the public meeting using one NRC line.

Thanks,

Brandon

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**Mail Envelope Properties** (44EB50C1.831 : 19 : 22577)

**Subject:** FAQ 06-0005, FAQ 06-0006, FAQ 06-0007 and 8/24 public meeting contact list

**Creation Date** Tue, Aug 22, 2006 2:47 PM

**From:** "JAMAR, Brandon" <btj@nei.org>

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

**Recipients**

nrc.gov

CEM4 (Charles Moulton)

PWL (Paul Lain)

QTN (Quynh Nguyen)

nrc.gov

SDW1 (Sunil Weerakkody)

**Post Office**

**Route**

nrc.gov

nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1265	Tuesday, August 22, 2006 2:47
PM		
FAQ 06-0005.pdf	177702	
FAQ 06-0006.pdf	122655	
FAQ 06-0007.pdf	15238	
805 TF.doc	69632	
Mime.822	531885	

**Options**

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

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

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled



Attachment 1:

## FAQ TEMPLATE

Plant: Harris Nuclear Plant (HNP)                      FAQ # 06-0005  
Submittal Date: 07-21-06  
Licensee Contact: Jeff Ertman                      Tele/email 919-546-3681  
NRC Contact: \_\_\_\_\_                      Tele/email \_\_\_\_\_

Distribution: Check all that apply (*NEI Internal Use*)

FPWG  RIRWG  NSSS OG  NFPA 805 TF

### **Subject:**

Interpretation of guidance? *Yes*

Proposed new guidance not in NEI 04-02? *Yes*

### **Details:**

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

*Not currently in NEI 04-02*

*This is to address Parking Lot open items #19 and #23*

Circumstances requiring guidance interpretation or new guidance:

***Reg. Guide 1.205, Risk informed. Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants, section 3.2.6 Cumulative Risk of Changes, states that “Post-transition risk reductions for plant changes that are not related to the Fire Protection Program (FPP) may be used to offset the risk increases attributable to FPP-related changes in accordance with Section 2.1.2 of RG 1.174, but must be pre-approved by the NRC as required by the standard fire protection license condition. Risk reductions for changes related to the FPP may be used as offsets without pre-approval by the NRC.”***

***This guidance provides no insight as to what could be considered a FPP-related change or not. Since failure to obtain NRC pre-approval for using risk reductions from a non-FPP related change would be a violation, there should be some guidance as to what is considered a FPP-related change when NFPA-805 is implemented.***

***The implementation of FPP changes using risk insights as one of the inputs for determining the acceptability requires a fire PSA. This results in a question as to whether changes in the fire PSA would be considered a FPP-related change.***

Detail contentious points if licensee and NRC have not reached agreement

***The areas where agreement is required:***

***1. Reg Guide 1.205 requires NRC pre-approval post transition when using risk reductions not related to the FPP. The FPP program post transition needs to be clearly defined as to what changes are FPP-related and what are not FPP-related.***

*2. Additionally it needs to be clarified as to what is considered a plant change when using the PSA to determine the importance of FPP-related changes.*

*3. Whether changes in the fire PSA are considered a plant change or a FPP-related change.*

Potentially relevant existing FAQ numbers:

*None*

### **Response Section**

Proposed Resolution of FAQ and the basis for the proposal:

*1. The FPP-related items post transition would be all of the FPP attributes required by Chapter 3 of NFPA 805 and those other FPP attributes used in Chapter 4. Examples include the fire detection, suppression, fire barriers and Electrical Raceway Fire Barrier Systems (ERFBS) ~~wrap~~ etc that are credited in reducing the risk of a fire. It would also include those fire protection programs such as fire brigade training or transient combustible control. It should also include the specific plant equipment, and fire procedures that are credited in the licensee fire safe shutdown analysis.*

*Basis:*

*These FPP attributes are part of the fire program licensing basis and are identified as such in the NFPA 805 License Amendment Request (LAR). What is not considered as FPP-related is the PSA model itself, which includes the documentation, data elements and associated logic. Additionally any plant equipment or procedures that is used in the fire PSA or the underlining Level I and Level II PSA, but is not specifically included as part of the safe shutdown analysis are not considered FPP-related. Some of these plant components or procedures could be used to reduce plant fire risk but are not included in the safe shutdown analysis. This provides a defined scope for FPP-related.*

*2. The term plant change is defined as a change to the physical plant systems structures or components (SSC) or plant operating, emergency or off-normal procedures.*

*Basis:*

*The changes to SSC that alter the facility or plant operating procedures are subject to 10 CFR 50.59 and thus easily understood as a plant change. With the scope of what is considered a FPP-related change defined, then changes that are not FPP-related, but offset the fire risk increase are also easily understood.*

*3. Changes in the fire PSA and the underlining Level I and Level II PSA are not FPP-related changes and also are not considered a plant change.*

***Basis:***

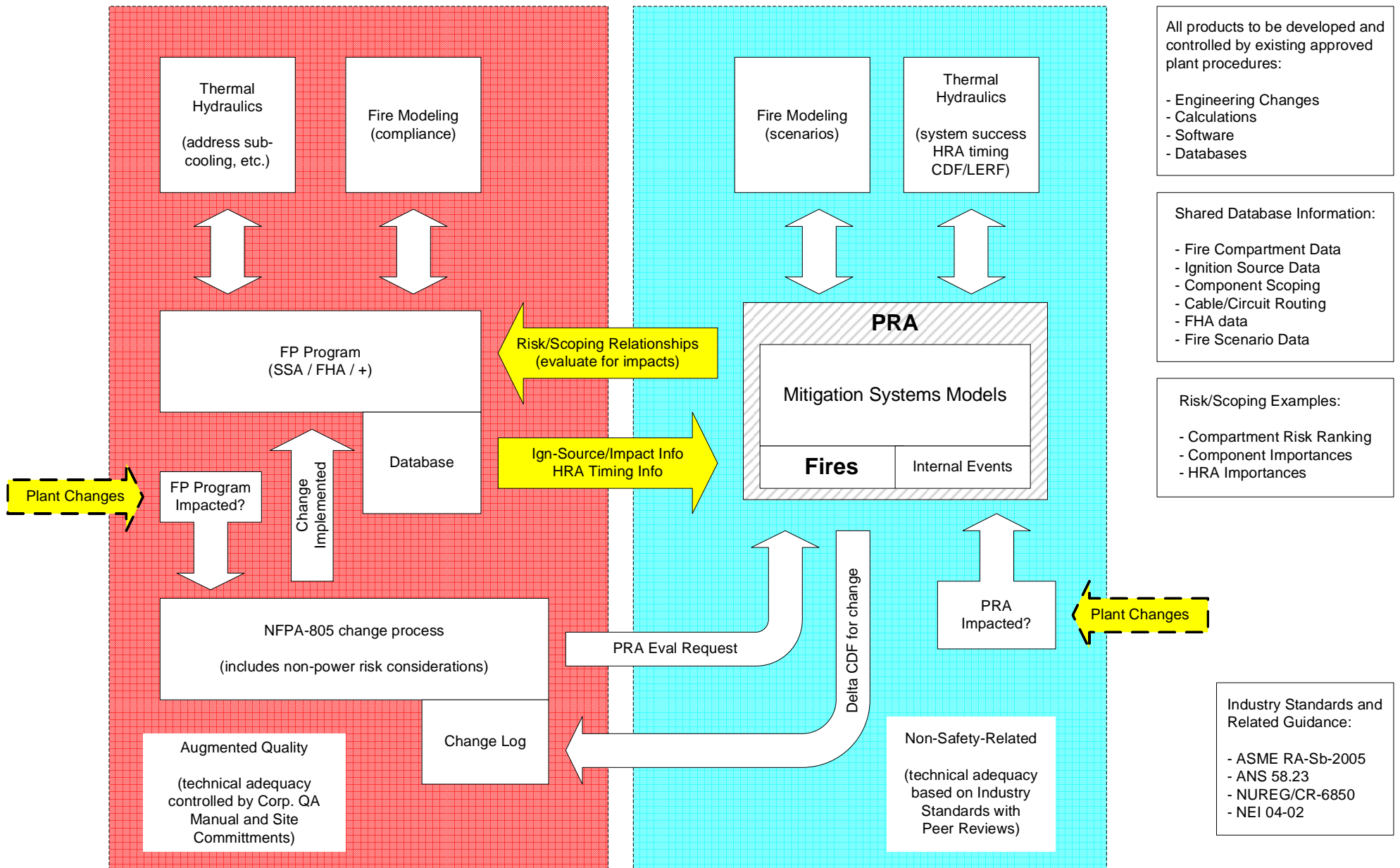
***The PSA itself (data, logic, supporting documentation and analysis) is built to reflect the facility as designed and operated. Thus a change to the PSA itself cannot be a change to the SSC or plant procedures and is not a FPP related change. As an example of potential changes in the fire PSA would be equipment reliability rates or changing the PSA logic such that only one of two ventilation fans are required to allow the supported equipment to perform its function. Plant changes, such as adding an additional high pressure injection pump to the facility that is not in the fire SSA and the associated PSA revision is a plant change and as such would require the NRC pre-approval per the requirements of RG1.205, if used to offset a FPP-related change with an associated risk increase.***

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

***The FPP-related items post transition would be all of the FPP attributes required by Chapter 3 of NFPA 805 and those other FPP attributes used in Chapter 4. Examples include the fire detection, suppression, fire barriers and ERFBS etc that are credited in reducing the risk of a fire. It would also include those fire protection programs such as fire brigade training or transient combustible control. It should also include the specific plant equipment, and fire procedures that are credited in the licensee safe shutdown analysis.***

***Plant Change is defined as: The term plant change is defined as a change to the physical plant systems structures or components (SSC) or plant operating, emergency or off-normal procedures. Updates of the fire PSA and the underlining Level I and Level II PSA are not FPP-related changes and also are not considered a plant change.***

***The attached figure provides a visual explanation of the difference between FPP-related and not FPP-related.***



## Progress Energy Fire PRA / Fire Protection Program Interface

Attachment 2:

## FAQ TEMPLATE

Plant: Harris Nuclear Plant (HNP)                      FAQ # 06-0006  
Submittal Date: 08-22-06  
Licensee Contact: Jeff Ertman                              Tele/email 919-546-3681  
NRC Contact: \_\_\_\_\_                                      Tele/email \_\_\_\_\_

Distribution: Check all that apply (*NEI Internal Use*)

FPWG  RIRWG  NSSS OG  NFPA 805 TF

### **Subject:**

**Interpretation of guidance?** Yes

**Proposed new guidance not in NEI 04-02?** Yes

### **Details:**

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

NEI 04-02 Section 4.3.2

NEI 04-02 Appendix B, Section B.2.1

### **Circumstances requiring guidance interpretation or new guidance:**

Section 4.3.2 of NEI 04-02 Revision 1 discusses the process for the Nuclear Safety Performance Criteria Transition Review. This section includes the process for the safe shutdown methodology review, evaluates the existing post-fire safe shutdown analyses against the guidance provided in Section 2.42 of NFPA 805. Appendix B-2 of NEI 04-02 provides details regarding the transition review. Section 2.1 of NEI 04-02 states:

“The review should be conducted against the methodology provided in NEI 00-01. This review is intended to ensure that the transitioning nuclear safety analysis meets basic established criteria for identification and analysis of equipment and cables. Exceptions and clarifications identified during the transition review should be documented in order to provide a well-established baseline for future changes.”

During a pilot plant review of the post-fire safe shutdown methodology against NEI 00-01 methodology. It was noted that the definition of high-low pressure interface provided in NEI 00-01 Revision 1 Appendix C, is not in strict alignment with the definition provided in NFPA 805 (2001 edition) section 1.6.31.

It is noted that the NFPA 805 text (Section 1.6.31) contains the definition of high-low pressure interface. However, the remainder of the NFPA 805 text does not include guidance or requirements related to high-low pressure interfaces. The only technical guidance on the subject is provided in Appendix B to NFPA 805, which has not been endorsed by the NRC.

Since this has historically been an area of varying interpretations, it is recommended that the

NEI 00-01 Revision 1 interpretation be utilized as part of the NEI 04-02 Revision 1 nuclear safety performance criteria methodology review.

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

Pilot plant meetings yielded no disagreement on this topic. This is Parking Lot Item 4 from the November 2005 Pilot Meeting (NRC meeting notes – ADAMS Accession No. ML060250034, Att. 2) and the March 2006 Pilot Meeting.

This topic has been a subject of varying interpretations for years. A consistent definition moving forward will avoid future confusion and interpretation by licensees, NRC inspectors, and NRR staff.

**Potentially relevant existing FAQ numbers:**

None

**Response Section**

**Proposed Resolution of FAQ and the basis for the proposal:**

Revise Section B.2.1 of NEI 04-02 to state (underlined section is the proposed resolution):

“Tables B-2 and B-3 of this Appendix outline a recommended method to review the acceptability of a program for transition by examining the basic components of a nuclear safety capability assessment. These worksheets organize the transition of the ‘pre-transitional safe shutdown analysis’ to the ‘nuclear safety analysis’ as follows:

1. Nuclear Safety Capability System and Equipment Selection
2. Nuclear Safety Capability Circuit Analysis
3. Nuclear Safety Equipment and Cable Location
4. Fire Area Assessment

The review should be conducted against the methodology provided in NEI 00-01. This review is intended to ensure that the transitioning nuclear safety analysis meets basic established criteria for identification and analysis of equipment and cables. Exceptions and clarifications identified during the transition review should be documented in order to provide a well-established baseline for future changes.

The methodology in NEI 00-01 for post-fire safe shutdown analyses may require additional clarification if the corresponding information in NFPA 805 is not in strict alignment (e.g., definition of high low pressure interfaces in NFPA 805, 2001 edition, Section 1.6.31, and NEI 00-01, Revision 1, Appendix C). For the purposes of the methodology review, the methodology in NEI 00-01 should be used as the basis for acceptability.

If the existing licensing basis is vague or silent on the methodologies identified, then a licensing basis should be clearly defined during the transition period. For example, if the existing



licensing basis is vague or silent on the methodology for circuit analysis (selection and/or protection of circuits) or evaluation of the failures of circuits within a fire area (single failure, any and all, one-at-a-time, sequential/concurrent, cumulative effects) a licensing basis should be established against which changes can be assessed post transition.”

**Basis:**

A consistent definition moving forward will avoid future confusion and interpretation by licensees, NRC inspectors, and NRR staff.

The interpretation of high-low pressure interface components is provided in NEI 00-01, Appendix C:

“Based on the above guidance, the following criterion is established to determine if a RCPB valve is considered a high/low pressure interface valve component: *A valve whose spurious opening could result in a loss of RPV/RCS inventory and, due to the lower pressure rating or other breaches such as relief valve operations on the downstream piping, an interfacing LOCA (i.e., pipe rupture in the low pressure piping).*”

The NRC has endorsed the methodology for safe shutdown analysis in NEI 00-01 on several occasions, most notably:

NRC Regulatory Issue Summary (RIS) 2005-30, Clarification of Post-Fire Safe-Shutdown Circuit Regulatory Requirements, dated December 20, 2005 (ADAMS Accession No. ML053360069) pages 1 and 2, states:

“This RIS also gives the NRC staff’s views on the use of NEI guidance document NEI 00-01, “Guidance for Post-Fire Safe Shutdown Circuit Analysis,” Revision 1 (ML050310295), in complying with Appendix R. The deterministic methodology presented in NEI 00-01, when applied in accordance with the regulatory expectations described in this RIS, is one acceptable approach to the analysis of post-fire, safe-shutdown circuits.”

In addition, the Draft Generic Letter 2006-XX, NRC Generic Letter 2006-XX: Post-Fire Safe-Shutdown Circuit Analysis Spurious Actuations (May 2006, ADAMS Accession No. ML061280517), page 7, states:

“The deterministic methodology in NEI 00-01, Rev. 1 (January 2005), “Guidance for Post-Fire Safe Shutdown Circuit Analysis,” Chapter 3 (including the associated appendices), for analysis of post-fire safe-shutdown circuits, in conjunction with the guidance provided in this GL, is one acceptable approach to achieving regulatory compliance with post-fire safe-shutdown circuit protection requirements for multiple spurious actuations. Licensees should assume that the fire may affect all unprotected cables and equipment within the fire area simultaneously and address all cable and equipment impacts affecting the required safe-shutdown path in the fire area. All potential impacts within the fire area should be addressed.”

Section B-2.1 of NEI 04-02 also states:

“The NRC staff has reviewed Revision 1 of NEI 00-01 and concluded that Chapter 3 provides an acceptable way to select circuits, and Chapter 4 provides an acceptable way to determine risk- significance of circuit findings.”

NEI 04-02 has been formally endorsed, with exceptions noted by Regulatory Guide 1.205, *Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants*, May 2006 (ADAMS Accession No. ML0601100174). Besides endorsement of NEI 04-02, the following statement is also provided in Section 3.3 of Regulatory Guide 1.205:

“Industry guidance document NEI 00-01, Revision 1, “Guidance for Post-Fire Safe Shutdown Circuit Analysis,” used in conjunction with NFPA 805 and this regulatory guide, provides one acceptable approach to circuit analysis for a plant that has transitioned to a 10 CFR 50.48(c) licensing basis.”

Attachment 3:

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

Plant:	<u>Harris Nuclear Plant (HNP)</u>	FAQ # <u>06-0007</u>
Submittal Date:	<u>08-22-06</u>	
Licensee Contact:	<u>Alan Holder</u>	Tele/email <u>919-546-3372</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 4.3.1.*

Circumstances requiring guidance interpretation or new guidance:

*Clarification of NFPA-805, Chapter 3 applicability requirements for fire brigades.*

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:

*Clarification to questions as presented.*

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

*As follows;*

**From NFPA-805, Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition)**

**3.4 Industrial Fire Brigade**

3.4.1 **On-Site Fire-Fighting Capability.** All of the following requirements shall apply.

- (a) A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site. This force shall have a minimum complement of five persons on duty and shall conform with the following NFPA standards as applicable:
  - (1) NFPA 600, *Standard on Industrial Fire Brigades* (interior structural fire fighting)
  - (2) NFPA 1500, *Standard on Fire Department Occupational Safety and Health Programs*
  - (3) NFPA 1582, *Standard on Medical Requirements for Fire Fighters and Information for Fire Department Physicians*

Based on section 3.4 of NFPA-805, is it correct to interpret that;

- 1 NFPA-600 would apply only to plants with a traditional fire brigade made up of employees from one or more plant departments?
- 2 NFPA-1500 and 1582 would apply only to those plants which utilize a fire department organization?
- 3 Reference in section 3.4.1(a)(1), to “(interior structural fire fighting)” limits the applicable sections of NFPA-600 (2000 edition) to Chapters 2 and 5, (excluding incipient stage fire fighting, and advanced exterior fire fighting, Chapters 3,4,6)?

Attachment 4:

Alan	Hackerott	OPPD/PWROG	hhackerott@oppd.com
Alan	Holder	Progress Energy	Alan.Holder@pgnmail.com
Alex	Marion	NEI	am@nei.org
Amir	Afzali	PG&E	axag@pge.com
Andy	Ratchford	Kleinsorg Group	andy_ratchford@msn.com
Barry	Collyer	Entergy	BCOLLYE@entergy.com
Biff	Bradley	NEI	reb@nei.org
Bob	Richter	SCE	richter@songs.sce.com
Brandi	Weaver	Duke Energy	btweaver@duke-energy.com
Brandon	Jamar	NEI	btj@nei.org
Chris	Pragman	Exelon	christopher.pragman@exeloncorp.com
Clarence	Worrell	PG&E	clwn@pge.com
Dan	MacDougall	AEP	demacdougall@aep.com
Dave	Finnicum	Westinghouse	David.j.finnicum@us.westinghouse.com
Dave	Miskiewicz	Progress Energy	david.miskiewicz@fpc.com
Fred	Emerson	GE	frederick.emerson@ge.com
Gary	Cooper	Constellation	gary.cooper@constellation.com
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Harry	Barrett	Duke Energy	htbarret@duke-energy.com
Howard	Brod	Entergy	hbrodt@entergy.com
James	Masterlark	NMC	james.masterlark@nmcco.com
Jeff	Ertman	Progress Energy	Jeffery.Ertman@pgnmail.com
Jim	Riley	NEI	jhr@nei.org
John	Lattner	Southern Nuclear	jdlattne@southernco.com
John	Reddington	FIRST Energy	jereddington@firstenergycorp.com
Ken	Heffner	Progress Energy	ken.heffner@pgnmail.com
Kiang	Zee	Kleinsorg Group	klzee@erineng.com
Liz	Kleinsorg	Kleinsorg Group	ekleinsorg@haifire.com
Micky	Heatherly	TVA	imheatherly@tva.gov
Mike	Franklin	Progress Energy	mike.franklin@pgnmail.com
Mike	Yungbluth	AmerenUE	MJYungbluth@cal.ameren.com
Nathan	Hall	Constellation	Nathan.Hall@constellation.com
Paul	Boulden	AppendixR Solutions	paulboulden@appendixr.com
Paul	Ouellette	EPM	pro@epm-inc.com
Rebecca	Puckett	Entergy	rpucket@entergy.com
Richard	Gray	AEP	rlgray2@aep.com
Roger	Sims	Kleinsorg Group	rsims@haifire.com
Stanley	Levinson	Areva	Stanley.Levinson@areva.com
Steve	Hardy	Progress Energy	steve.hardy@pgnmail.com
Tom	Gorman	PPL	tagorman@pplweb.com
Tom	Jutras	EPM	thj@epm-inc.com
Tom	Shudak	NPPD	tgshuda@nppd.com
Vinny	Rubano	FPL	Vinny_rubano@fpl.com

Joe Fortman, AmerenUE

Ken Halliday, FIRST Energy