

September 14, 2007

MEMORANDUM TO: Sunil D. Weerakkody, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Daniele H. Oudinot, Reactor Systems Engineer **/RA/**
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JULY 13, 2007, PUBLIC MEETING WITH DUKE
POWER REGARDING PILOT PLANT TRANSITION TO NATIONAL
FIRE PROTECTION ASSOCIATION STANDARD 805

On July 13, 2007, the U.S. Nuclear Regulatory Commission staff from Headquarters and Region II participated in a public meeting with Duke Power to discuss Oconee Nuclear Station transition to the National Fire Protection Association (NFPA) Standard 805.

The meeting took place at the Oconee site in Seneca, South Carolina. This public meeting followed a non-public NFPA 805 observation visit also held at the Oconee site on July 10, 11, and 12, 2007.

Enclosed are a list of the meeting participants (Enclosure 1) and a summary of the discussion topics and status (Enclosure 2). The publically available documents handed out during the meeting are available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML072140380.

Enclosures:

1. Meeting participants
2. Summary Topics and Status

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**PUBLIC MEETING
REGARDING PILOT PLANT (OCONEE)
TRANSITION TO NATIONAL FIRE PROTECTION
ASSOCIATION STANDARD 805**

List of Participants

U.S. Nuclear Regulatory Commission Staff

S. Walker
J.S. Hyslop
E. McCann
P. Lain
J. Circle
R. Gallucci
S. Laur
H. Barrett

Stakeholders

Duke Power Representatives
Members of the Public
Industry Representatives
Consultants to the Industry
Progress Energy Representatives
Nuclear Energy Institute Representatives

ENCLOSURE 1

PUBLIC MEETING (July 13, 2007)
Category 2

Paul Lain – introduction; good progress by both pilots; upcoming Nuclear Energy Institute (NEI) Task Force meeting that can reveal some of the more sensitive material not available as part of public meetings

David Goforth – status of Oconee transition (presentation)

- AREVA completing App. R reconstitution

- Tables B-1, B-2 and B-3 ready or under development

- Emergency Planning preparing radioactive release analysis

- Non-power operations analysis on hold awaiting the Nuclear Regulatory Commission (NRC) presentation at the NEI Frequently Asked Questions (FAQ) meeting on July 19th

- Configuration control requires maintaining both current Fire Protection Program (FPP) and upcoming National Fire Protection Association (NFPA)-805 FPP; Oconee is performing many major modifications (using AREVA to track)

- Documentation of all the above, especially configuration control

- License Amendment Request (LAR) supported by Duke Licensing; impacts on the updated final safety analysis report; LAR submittal aimed for May 2008

- All three Duke sites are now officially in NFPA-805 transition (last, Catawba, entered July 2nd)

Harold Lefkowitz – Table B-1 (presentation)

- Classical FP; supported by NEXUS

- Providing input for Fire Probabilistic Safety Assessment (FPSA) under NUREG/CR-6850 on ignition sources

- Table B-1 shows alignment with classical Fire Protection (FP) in NFPA-805 Chapter 3.

- Walkdown throughout plant to create current Fire Hazards Analysis

- Compliance status assessed with respect to NFPA-805 Chapter 3 requirements; supported by supplementary report to Table B-1

Liz Kleinsorg – Tables B-2 and B-3; Non-power operations (presentations)

- Implications of “non-alignment” with NEI 00-01 (only guidance) – assess for “adverse consequences”

- Oconee currently has licensing basis exempting them from spurious actuations during first 10 min of a fire (analogous to Harris’ SER assumption of no intercable interactions)

- Table B-3 addresses interface with NFPA-805 Chapter 4 (and when there is need to evaluate against Chapter 3), including Engineering Equivalency Evaluations; B-3 summarizes but does not provide details

- Need to know where the difference between deterministic and performance-based analysis lies for existing compliances

Project Instructions address (1) development of Table B-3, (2) assessing accomplishment of NFPA-805 performance goals, (3) review of fire area licensing actions (“bring forward”),

ENCLOSURE 2

(4) review of Engineering Equivalency Evaluations (FAQ 07-0033), (5) documenting results and defining open items

NEI 04-02, App. F, lays out methodology to address non-power operations focusing only on complete loss of key safety functions via pinch points

Oconee and Harris exclude spent fuel pool from high risk evolution due to plentitude of time to replace water if necessary

Ed Simbles and Andy Ratchford – Duke FPSA and Plant Change Evaluations (presentation)

Multi-compartment analysis washes out problems with compartment definition

As FPSA is being developed, Oconee-3 internal events Probabilitistic Safety Assessment (PSA) is undergoing upgrade to meet RG-1.200

Human Error Probability (HEP) screening methodology differs from NUREG/CR-6850

American Nuclear Society FPSA Standard is requiring more extensive treatment of fire-induced loss of instrumentation than advocated in NUREG/CR-6850

So far, no assumption that trip of one unit causes trip of another

Credit has not yet been taken for suppression

0.3 probability factor for armored cable hot shorts is “only used when needed”

FP defense-in-depth and safety margin is well addressed in NEI 04-02 and RG-1.205

Andy Ratchford – Parking Lot

Bringing forward approved Safety Evaluation Reports assumptions – red box FP vs. blue box PSA

Duke’s HEP screening vs. NUREG/CR-6850