

November 13, 2007

MEMORANDUM TO: AFB File

FROM: Alex Klein, Chief */RA/*
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: CLOSE-OUT OF NATIONAL FIRE PROTECTION ASSOCIATION 805
FREQUENTLY ASKED QUESTION 06-0007, SPECIFIC
CLARIFICATION CONCERNING PLANT FIRE BRIGADES

Summary of Issue Raised by Frequently Asked Question (FAQ) 06-0007

The Fire Protection Branch has reviewed FAQ Number 06-0007, Revision 3 (Agencywide Documents Access and Management system (ADAMS) Accession Number ML071550408). This FAQ proposes a clarification to section 3.4.1(a) of National Fire Protection Association standard 805 "Performance-Based Standard for Fire Protection for Light Water Reactor Electrical Generating Plants," 2001 Edition (NFPA 805), concerning requirements for fire brigades. This FAQ also recommends adding a new Appendix (Appendix K) to Nuclear Energy Institute document 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.48 (c)," Revision 1 (NEI 04-02). The proposed clarification would appear in the new Appendix.

FAQ Proposal

The FAQ proposes to create "Appendix K" in NEI 04-02 to contain specific clarifications of sections of NFPA 805. The FAQ also proposes to add the following clarification of NFPA 805 section 3.4.1(a) to the new Appendix:

The NFPA standards divide fire brigades into two types, based on organization and duties: "Industrial Fire Brigades" and "Industrial Fire Departments." Practically, this means that a fire fighting organization at a nuclear power plant must comply with either NFPA 600 (for an Industrial Fire Brigade) or both NFPA 1500 and NFPA 1582 (for an Industrial Fire Department)

Reference in section 3.4.1(a)(1), to "(interior structural fire fighting)" indicates that for interior fire fighting, at a minimum, the licensee shall meet the requirements noted in NFPA 600, Chapter 5, Industrial Fire Brigades That Perform Interior Structural Fire Fighting Only. For exterior fire that could jeopardize the ability to meet the performance criteria described in NFPA 805, Section 1.5.1 the licensee shall be able to demonstrate their ability to control and extinguish those fires.

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FAQ 06-0007, Revision 3, also includes the proposed preface for Appendix K to NEI 04-02, Revision 1.

NRC Staff Conclusion

The staff has reviewed the proposed clarification as shown above and in FAQ 06-0007, Revision 3, and has determined that this clarification reflects the correct manner in which the various NFPA standards interact with each other. Therefore, the Staff accepts this clarification for use by licensees adopting a risk-informed, performance-based fire protection program and for incorporation in the next revision to NEI 04-02. The staff also has no objection to the creation of the new "Appendix K."

References:

For details regarding this FAQ, please see the following:

- FAQ 06-0007, Revision 0 (08/22/06) (ADAMS accession number ML062350121)
- NRC Staff response to FAQ 06-0007, Revision 0 (10/26/07) (ADAMS accession number ML063170365)
- FAQ 06-0007, Revision 1 (12/19/06) (ADAMS accession number ML070030325)
- FAQ 06-0007, Revision 2 (02/15/07) (ADAMS accession number ML070510442)
- NRC Staff response to FAQ 06-0007, Revision 2 (05/17/07) (ADAMS accession number ML071380338)
- FAQ 06-0007, Revision 3 (05/21/07) (ADAMS accession number ML071550408)
- NEI 04-02, Revision 1, (ADAMS accession number ML052590476)
- NFPA 805, 2001 Edition (available through the Public Document Room or NFPA)
- Regulatory Guide 1.205 (ADAMS accession number ML061100174)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession number ML061660105)

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