

October 17, 2007

MEMORANDUM TO: AFPB File

FROM: Alexander Klein, Chief /RA/  
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Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: CLOSURE OF NATIONAL FIRE PROTECTION ASSOCIATION  
805 FREQUENTLY ASKED QUESTION 06-0028

Summary of Issue Raised by Frequently Asked Question (FAQ) 06-0028

The Fire Protection Branch (AFPB) has reviewed National Fire Protection Association (NFPA) 805 FAQ 06-0028. The FAQ proposed a revision to Section 4.3.1, "Fundamental Fire Protection Program and Design Elements Transition Review, appendices to list acceptable interpretations to the NFPA 805 standard," of Nuclear Energy Institute (NEI) 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).

FAQ 06-0028 proposes a clarification of NFPA 805 "Performance-Based Standard for Fire Protection for Light Water Reactor Electrical Generating Plants," 2001 Edition, (NFPA 805), Chapter 3, section 3.3.1.1, General Fire Prevention Activities, (1) "Training on fire safety information for all employees and contractors including, as a minimum, familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms." Specifically, FAQ 06-0028 proposes to clarify what is "familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms" regarding the scope of or depth of the training.

FAQ 06-0028, Revision 0, Initial FAQ Proposal.

In the original version of FAQ 06-0028, NEI proposed the following clarification to be included in (New) Appendix K to NEI 04-02 upon acceptance of the specific clarification:

Where used in Section 3.3.1.1, the term, "familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms," shall be considered to be equivalent to that information presented in the plant's approved General Employee Training (GET). Specific training objectives should include;

- State individual responsibilities regarding fire barriers such as fire dampers, doors, and seals.
- State actions an individual is required to take upon discovery of a fire.
- State individual responsibilities regarding the control of fire loading(wood, solvents, oil) and the disposal of flammable materials.
- State examples of the types of hot work requiring a permit.
- Recognize and state the response to a station fire alarm

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U.S. Regulatory Commission (NRC) Staff Response to FAQ 06-0028, Revision 0

The staff made two comments regarding the initial proposal: First, the NRC does not approve GET programs. The staff suggested that the word "approve" be removed from the initial proposal. Second, the initial proposal could be interpreted to mean that GET programs are acceptable, which is only the case when the GET programs meet the requirements of NFPA 805.

The staff proposed that FAQ 06-0028, Revision 0, be revised to read:

Where used in Section 3.3.1.1(1), the term, "familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms," should be considered to be acceptable when it includes the minimum following training objectives;

- Where to find and how to use plant fire prevention procedures.
- The individual's responsibilities regarding fire barriers such as fire dampers, doors, and seals.
- The actions an individual is required to take upon discovery of a fire.
- The individual's responsibilities regarding the control of transient combustibles (wood, solvents, oil) and the disposal of flammable and combustible materials.
- Examples of the types of hot work that requires a permit.
- Familiarization and the proper response to various station fire alarms.
- Other plant specific fire prevention activities. [ to ensure that special cases are addressed]

This familiarization may be included as part of the plant's General Employee Training (GET) program.

Revision 1 to FAQ 06-0028

In FAQ 06-0028, Revision 1, NEI proposed that the following clarification for NFPA 805 , Section 3.3.1.1, be included in (New) Appendix K to NEI 04-02:

Where used in section 3.3.1.1, the term, "familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms", should be considered to be acceptable when it includes the minimum following training objectives;

- Location and use of plant fire prevention procedures.
- Individual responsibilities regarding fire barriers such as fire dampers, doors, and seals.
- Actions an individual is required to take upon discovery of a fire.
- Individual responsibilities regarding the control of fire loading (wood, solvents, oil) and the disposal of flammable materials.
- Examples of the types of hot work requiring a permit.
- Recognition of, and response to a station fire alarm.
- Other plant specific fire prevention activities.

This familiarization may be included as part of the plant's General Employee Training (GET) program.

### NRC Staff Response to FAQ 06-0028, Revision 1

The staff made two comments regarding the FAQ 06-0028, Revision 1: First, the term “fire loading” was unnecessarily broader than the term “transient combustibles” the staff suggested in its response to FAQ 06-0028, Revision 0. Second, the term “combustible,” as suggested by the staff in its response to FAQ 06-0028, Revision 0, had been omitted from the sentence that read: “Individual responsibilities regarding the control.....and the disposal of flammable [and combustible] materials.

The staff proposed that FAQ 06-0028, Revision 1, be revised to read:

Where used in section 3.3.1.1, the term, “familiarization with plant fire prevention procedures, fire reporting, and plant emergency alarms”, should be considered to be acceptable when it includes the minimum following training objectives;

- Location and use of plant fire prevention procedures.
- Individual responsibilities regarding fire barriers such as fire dampers, doors, and seals.
- Actions an individual is required to take upon discovery of a fire.
- Individual responsibilities regarding the control of transient combustibles (wood, solvents, oil) and the disposal of flammable and combustible materials.
- Examples of the types of hot work requiring a permit.
- Recognition of, and response to a station fire alarm.
- Other plant specific fire prevention activities.

This familiarization may be included as part of the plant’s General Employee Training (GET) program.

### Revision 2 to FAQ 06-0028

In FAQ 06-0028, Revision 2, NEI replaced the term “fire loading” with the term “transient combustibles” and added the term “combustible,” as proposed by the staff in its response to Revision 1 to FAQ 06-0028.

### NRC Staff Response to FAQ 06-0028 Revision 2

The NRC staff has reviewed the change proposed in FAQ 06-0028, Revision 2, submitted on May 21, 2007. The staff has determined that the proposed change meets the intent of NFPA 805, Section 3.3.1.1 because the change includes all of the elements required in Section 3.3.1.1. The staff accepts the proposed change and its incorporation in the next formal revision to NEI 04-02

### References

For details regarding this FAQ, please see the following:

- FAQ 06-0028, Revision 0 (11/20/2006) (ADAMS accession No. ML070030489)
- FAQ 06-0028, Revision 1 (04/16/2007) (ADAMS accession No. ML071340195)

- FAQ 06-0028, Revision 2 (05/21/2007) (ADAMS accession No. ML071550415)
- NEI 04-02, Revision 1 (ADAMS accession No. ML052590476)
- NFPA 805, 2001 Edition (available through the Public Document Room or NFPA)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession No. ML061660105)

