

Staff Comments:

1. All of the information that is to be captured and used in the future (e.g., the methodology to determine acceptable tests) needs to be included in the text to be added to NEI 04-02.
2. The staff is not convinced that Appendix D is the correct location for this information. We suggest that it could find a home in the new Appendix K or in another new section.
3. It should be noted that the NRC analysis is test-based, not standard-based. The author needs to be careful not to write "standard" when they mean "test" (i.e. in the final paragraph on page 10 of 10).
4. On page 4 of 10 of the current Revision:
 - Eliminate the first sentence after the Table that starts: "**Note: A reference...**"
5. Again on page 4 of 10:
 - There is a typo in the (third) paragraph describing the UL1666 Fire Riser Test. The last sentence reads: "Even though the damage criteria is less severe than the IEEE 383-1974 (12 ft vs. **10** ft),...". It should read "... (12 ft vs. **8** ft)...". This also appears in the RES report. The correction does not affect the result of the analysis.
6. On page 8 of 10:
 - There is a typo in the second paragraph in the "Summary of the Results..." section. The reference to IEEE 383-**1991** should be to IEEE 383-**1974**. This error also appears in the RES report, but does not affect the result of the analysis.

For clarity, the staff suggests that the first two sentences in the second paragraph be eliminated and the remainder of this section be combined into one paragraph. To wit:

Tables 1 and 2 below provide a summary of the testing methods that are more severe than IEEE 1202-1991 (Table 1) or more severe than IEEE 383-1974 (Table 2). Note that all test standards in Table 1 are also included in Table 2, since IEEE 1202-1991 is a more rigorous test method than IEEE 383-1974.

7. The staff requests clarification regarding the last paragraph on page 10 of 10. Is this "equivalency evaluation" the same one as in FAQ 06-0008? What will licensees do with them when they are performed post-transition? Will these analyses be transmitted to other licensees? The staff also suggests that, when they are identified/performed during transition, it would be prudent for licensees to include these evaluations in their license amendment request (perhaps as a line item)..