

NEI 04-02

Frequently Asked Questions

Pathway to Resolution

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Frequently Asked Questions (FAQ) Status as of August '07

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|--|-----------|
| Total FAQs Generated | 39 |
| Total FAQs Resolved or Withdrawn | 18 |
| FAQs w/ NRC for Review / Resolution | 10 |
| FAQs w/ NEI 805 Task Force for Review / Resolution | 11 |

FAQs under Development and T.F. Review

FAQ 06-0004 (Began / Miskiewicz)

- Purpose
 - ▶ Clarify NFPA 805, Chapter 3 & 4 relationship for “required” FP Systems and Features.
- Resolution Plan
 - ▶ How fire protection systems and features transition is highly dependent their requirements to meet nuclear safety performance criteria of NFPA 805, Chapter 4.
 - ▶ Proposed categorization of systems by use in program analysis:
 - ◆ NFPA 805 credited: B-3, Defense-in-Depth, Change Evaluation
 - ◆ Not NFPA 805 credited: Other FP systems in PRA – subject to PRA change process / cyclic update process
 - ▶ NFPA 805 Credited systems clearly identified in FSA – new CLB
 - ▶ Monitoring process addressed separate from this FAQ
- Schedule
 - ▶ Expect to submit Rev. 1, 2007 3rd Quarter.

FAQs under Development and T.F. Review

FAQ 06-0009 (Kleinsorg)

- Purpose
 - ▶ Administrative correction of typo-graphical errors noted in NEI 04-02, Rev 1.
- Resolution Plan
 - ▶ Placeholder for editorial corrections to be submitted in NEI 04-02, Rev. 2
- Schedule
 - ▶ Expect to submit FAQ Rev. 0, January 2008

FAQs under Development and T.F. Review

FAQ 06-0010 (Ertman/Ratchford)

- Purpose
 - ▶ Incorporate Regulatory Guide 1.205 Baseline concept into NEI 04-02.
- Resolution Plan
 - ▶ Changes to Reg. Guide 1.205, NEI 04-02 indicate need to reflect baseline risk.
 - ▶ Will update NEI 04-02 with baseline risk, baseline compliance discussion from Oconee Pilot meeting
- Schedule
 - ▶ Expect to submit Rev. 0, 2007, 3rd Quarter

FAQs under Development and T.F. Review

FAQ 06-0014 (Miskiewicz)

- Purpose
 - ▶ Cumulative Risk
- Resolution Plan
 - ▶ Reg. Guide 1.205 requires tracking of changes to assess cumulative risk.
 - ▶ FAQ currently with Progress Energy for development.
- Schedule
 - ▶ Expect to submit Rev. 0, in September, 2007

FAQs under Development and T.F. Review

FAQ 06-0015 (Masterlark)

- Purpose
 - ▶ Guidance on “Not Red” determination
- Resolution Plan
 - ▶ Process needs simplification for determining if non-compliances found during the transition process are “Not Red”.
- Schedule
 - ▶ Expect to submit Rev. 0, 2007, 3rd Quarter

FAQs under Development and T.F. Review

FAQ 06-0022 (Puckett - ANO)

- Purpose
 - ▶ Identify a list of flame propagation tests which will be considered acceptable during NFPA 805, Chapter 3 reviews.
- Resolution Plan
 - ▶ Review and incorporation of NRC Office of Research listing of acceptable tests.
 - ▶ NEI Task Force to provide updated revision.
- Schedule
 - ▶ Expect to resubmit to NRC staff by 8-23-07.

FAQs under Development and T.F. Review

FAQ 06-0024 (Holder)

- Purpose
 - ▶ Define “adequate clearance” and “energized electrical equipment” as applied in NFPA 805 Chapter 3.
- Resolution Plan
 - ▶ Provide “process” for determining adequate clearance rather than a spatial parameter.
- Schedule
 - ▶ Expect to resubmit to Task Force by 8-10-07, and NRC staff by 8-23-07.

FAQs under Development and T.F. Review

FAQ 07-0030 (Masterlark)

- Purpose
 - ▶ Define Risk of Recovery Actions
- Resolution Plan
 - ▶ Clarification is needed for evaluating the risk impact of recovery actions, including HRA scenarios, when these actions result in the use of a performance based approach as described in NFPA 805, Section 4.2.4.
- Schedule
 - ▶ Expect to submit Rev. 0, 2007, 3rd Quarter

FAQs under Development and T.F. Review

FAQ-07-0034 (Miskiewicz)

- Purpose
 - ▶ Clarification for treatment of non-vented electrical cabinets.
- Resolution Plan
 - ▶ Provide new attachment on interpretation issues from NEI 04-02.
- Schedule
 - ▶ Expect to submit Rev. 0, to Task Force 8-13-07, and to NRC staff by 8-23-07.

FAQs under Development and T.F. Review

FAQ 07-0038 (Began)

- Purpose
 - ▶ Lessons Learned for Operator Manual Actions (OMA), Multiple Spurious Operations (MSO) and Fire PRA (FPRA).
- Resolution Plan
 - ▶ Incorporate pilot plant lessons learned into NEI 04-02, Rev 2.
- Schedule
 - ▶ Expect to submit Rev. 0, to Task Force by end of August, 2007.

FAQs under Development and T.F. Review

FAQ 07-0039 (Ratchford)

- Purpose
 - ▶ Update of NEI 04-02, Rev. 1, Tables B-2 and B-3 and associated process.
- Resolution Plan
 - ▶ Incorporate lessons learned from Pilot Plants during Tables B-2 and B-3 development, into NEI 04-02, Rev 2 .
- Schedule
 - ▶ Expect submittal to NEI Task Force 8-23-07.

FAQs currently with NRC for Review

FAQ 06-0005, R1

- Purpose
 - ▶ Guidance on FPP related changes.
- Resolution Plan
 - ▶ NEI 04-02 does not provide guidance for what should 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 contrary to the guidance in RG 1.205, additional guidance should be provided to clarify what is considered a FPP-related change once NFPA-805 is implemented.
- Schedule
 - ▶ NRC has indicated expectation for closure by 9-30-07
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0008, R5

- Purpose
 - ▶ Alternate Method for Engineering Evaluations
- Resolution Plan
 - ▶ Many Generic Letter 86-10 evaluations exist at facilities today. Transition of these existing evaluations is essential for the success of the Pilot Plants. In addition the use of engineering evaluations for Chapter 3 issues post transition needs to be clarified.
- Schedule
 - ▶ TF preparing draft Rev 6, based on feedback, for submittal to NRC.
 - ▶ NRC has indicated expectation for closure by 9-30-07.
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0011, R1b

- Purpose
 - ▶ Clarify 10CFR50, Appendix R, Section III.G.3 Compliance Transition
- Resolution Plan
 - ▶ Provide specific details to address Alternate Shutdown in NEI 04-02.
- Schedule
 - ▶ NRC has indicated expectation for issuance of comments by 8-23-07, and closure by 9-30-07.
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0019, R1

- Purpose
 - ▶ Define “Power Block” and “Plant”
- Resolution Plan
 - ▶ Define where used in Chapter 3, “power block” and “plant” are intended to mean “areas in which a fire could jeopardize the ability to meet the nuclear safety performance criteria described in section 1.5.”
 - ▶ NRC has indicated concerned about “broadness” of definition (e.g., Turbine building may not be included in this definition).
- Schedule
 - ▶ NRC anticipates issuance of additional comments.
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0027, R0

- Purpose
 - ▶ Clarify the descriptive term “where provided” in NFPA 805, Chapter 3.
- Resolution Plan
 - ▶ Clarify the term “where provided” to be those locations that exist at present as part of the design, or as documented through a Code Compliance review document, or lacking same in accordance with applicable NFPA code.
- Schedule
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2.

FAQs currently with NRC for Review

FAQ 06-0031, R0

- Purpose
 - ▶ Miscellaneous Binning Issues
- Resolution Plan
 - ▶ Questions arise during ignition frequency counting, such as which bins are appropriate for: MOV motors, Hydraulic actuators for valves, Transformers.
- Schedule
 - ▶ With NRC Office of Research
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0032, R0

- Purpose
 - ▶ 10CFR50.48(a) and GDC 3 clarification
- Resolution Plan
 - ▶ Clarify language in NEI 04-02, to reference or restate the guidance found in Federal Register Notice 69 FR 33536, such that satisfying 10CFR50.48(c) will satisfy 10CFR50.48(a) and GDC 3.
- Schedule
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0033, R0

- Purpose
 - ▶ Review of Existing Engineering Equivalency Evaluations (EEEEEs)
- Resolution Plan
 - ▶ Describes how EEEEEs will be reviewed and summarized for transition.
- Schedule
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0035, R0

- Purpose
 - ▶ Bus Duct counting guidance for High Energy Arcing Faults
- Resolution Plan
 - ▶ Split from original FAQ 06-0017, to only address method for counting Bus Ducts.
- Schedule
 - ▶ NRC to discuss in panel meeting 8-17-07
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

FAQs currently with NRC for Review

FAQ 06-0036, R0

- Purpose
 - ▶ Provide definitions of “compliance categories” used during development of NEI 04-02, Table B-1.
- Resolution Plan
 - ▶ Revise sections 4.3.1 and Table B-1 of NEI 04-02 based on feedback from pilot plants observation meeting reviews of draft Table B-1 products.
- Schedule
 - ▶ Expect resolution for inclusion in NEI 04-02, Rev. 2

What's Next?

NEI 04-02, Revision 2

- FAQ proposed cut-off date, September 2007
- FAQs to be incorporated need approval by January 2008
- NEI 04-02, Revision 2 needs approval to support May 2008 License Amendment Request (LAR) submittals from Pilot Plants.
- Follow-up Regulatory Guide revision providing endorsement.