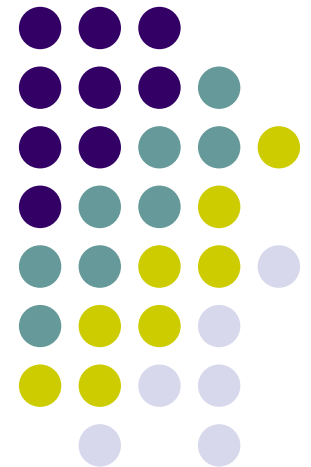


NRC Fire Protection Steering Committee

October 17, 2007



Membership



- Jack Grobe, Chairman
- Mark Cunningham, DRA
- Steven West, Region III
- Christiana Lui, RES
- Stewart Magruder, OE

Purpose



- Facilitate predictable and clear implementation of NFPA 805
- Facilitate resolution of key fire protection policy, regulatory, and technical issues
- Interface with industry on fire protection issues
- Ensure effective interoffice coordination
- Interface with senior NRC managers

Topics



- 10 CFR 50.48(c): NFPA 805 Transition
- Fire Probabilistic Risk Assessment
- Multiple Spurious Actuations (MSAs)
- Post-Fire Operator Manual Actions

NFPA 805 Transition - Background



- Letters of Intent for 42 Units at 28 Sites
- 38 Units at 25 Sites are Actively Transitioning
- 36 Month Discretion Period to Transition
- Eight Pilot Observation Visits Completed
- Frequently Asked Question (FAQ) Process
- 15 Public Meetings w/ NEI 805 Task Force
- Non-Pilot Update at the NEI FP Info Forum
- NFPA 805 plants will perform Fire PRAs

NFPA 805 Transition – Issue



- Enforcement Discretion Extension Request
 - Availability of pilot information prior to License Amendment Request (LAR) submission
 - Timely NRC Staff review of multiple LAR submittals
 - Timeliness of endorsed Fire PRA standard.
 - Availability of PRA practitioners for Fire PRA development and peer review

NFPA 805 Transition - Status



- Pilots
 - Two additional Observation Visits (November and April)
 - Fire PRA Staff reviews (January and February)
 - LAR Submittals (May and June)
- Non-Pilots
 - Complete transition activities including Fire PRAs
 - Conduct Fire PRA peer reviews
 - Initial LAR submittals expected in November 2008

Fire PRA - Background



- ANS Fire PRA (FPRA) to be issued [and endorsed, by NRC] as Part 3 of the ASME combined PRA standard
- Per the ANS standard, each plant will be subject to a FPRA peer review to assess the degree to which it meets the quality requirements of the standard
- These reviews will be done according to an NEI/Owners Group FPRA Peer Review Guide

Fire PRA - Status



- ASME has issued the combined PRA standard for public comment
- NRC is awaiting the next version of the NEI/Owners Group FPRA Peer Review Guide

Fire PRA – Issue Summary



- Timeliness of FPRA standard's publication and NRC endorsement considering the NFPA-805 License Amendment Request schedules
- Industry concerns over staffing shortfalls for FPRA development and peer reviews.
- FPRA methodology evolving as plants perform FPRAs

Multiple Spurious Actuations (MSAs) - Background



- NRC Staff proposed Generic Letter (GL) 2006-XX requesting licensees to confirm compliance in light of the relatively high probability of multiple spurious actuations
- Commission did not approve issuing proposed GL in SECY/SRM-06-0196, “Issuance of Generic Letter 2006-xx, ‘Post-Fire Safe-Shutdown Circuits Analysis Spurious Actuations’” December 1, 2006
- NRC staff continues to use the SECY/SRM-06-0196 for direction
- NRC staff met with Industry and received Industry’s methodology of a method in February 2007
- Industry presented their detailed methodology to address multiple spurious actuation on September 6, 2007

MSAs – NEI Proposal



- Proposed methodology includes consideration of risk in determining compliance outside of 10 CFR 50.48(c)
- Cumulative and synergistic effects should be considered, which may not be effectively considered by an expert panel
- If PRA methods or tools are used, these methods or tools should be of adequate detail and quality
- Method should consider MSAs in III.G.3 (III.L) areas

MSAs - Status



- NRC staff will continue to engage NEI to address MSA's
- Commission directed in SECY/SRM-06-0196, that the NRC staff should continue to encourage licensees to transition to 10 CFR 50.48(c), NFPA 805, the agency's risk-informed, performance-based fire protection rule

Operator Manual Actions (OMAs)



- Regulatory Issue Summary 2006-10, “Regulatory Expectations with Appendix R Paragraph III.G.2 Operator Manual Actions,” issued June 30, 2006
- Enforcement discretion:
 - September 6, 2007: implement compensatory measures and initiate corrective actions
 - March 6, 2009: complete corrective actions

OMAs (Continued)



- Standard Review Plan (SRP) Section 9.5.1, “Fire Protection Program”, and Inspection Procedure (IP) 71111.05T, “Fire Protection [Triennial],” have been updated
- Reactor Oversight Process continues to verify compliance with regulations and commitments
- NUREG-1852 addresses the performance of post-fire operator manual actions

OMAs - Status



- Licensees are expected to bring operator manual actions back into compliance as described in RIS 2006-10.
- NRC Staff intends to use NUREG-1852 for future licensing actions or exemptions relating to the use of post-fire operator manual actions.
- NUREG-1852 will be issued Oct/Nov 2007