

## Comment:

1. The FAQ Details section still refers to Section 4.4, which is not being addressed by this FAQ at this time (will be addressed by later FAQs dealing with definition of FPP).
2. The following sentence from page 2 of 3 of FAQ 06-005, Rev. 2 should either be revised or deleted from the FAQ:

*“If the Nuclear Safety Capability Assessment will not be revised as a result of this change to include this new pump as a success path credited to meet the nuclear safety performance criteria, then it is not considered a fire protection program-related change, and as such, would require the NRC pre-approval per the requirements of RG1.205, if used to offset a FPP-related change with an associated risk increase.”*

Discussion: Although a modification may add a new component that could help in reducing fire risk through crediting it in the PRA, only relying on the disposition of the component with respect to its use (as a success path credited) in the Nuclear Safety Capability Assessment is not sufficient to define all risk contribution by the new component. The assessment must also consider potential risk increase due to unwanted operation of the component as well (fire-induced spurious actuation of a new pump may be detrimental to risk and must be evaluated). There may be situations where the pump will only have a benefit in risk space (the pump is isolated by manual valves that can not spuriously actuate during a fire, but procedures are in place to manually place the pump in service in response to a fire). In this situation, the pump may not be considered a fire protection program-related change, and as such, would require NRC pre-approval per the requirements of RG 1.205, if used to offset a FPP-related change with an associated risk increase.

3. The following sentence from the paragraph to be inserted into NEI 04-02 should be either deleted or significantly modified:

*“Additionally, any plant equipment or procedures that are used in the fire PRA or the underlying Level I and Level II PRA, but are not specifically included as part of the nuclear safety capability assessment, are not considered Fire Protection Program-related.”*

This sentence goes beyond the scope of this FAQ in that, it is attempting to extend the exclusion of the Fire PRA from the program to include any systems/equipment (and their associated procedures) included in the PRA. Whether or not a piece of equipment is included in the FPP has nothing to do with the PRA; The FAQ is trying to make the point that systems/equipment should not

be classified as part of the FPP just because it is included in the scope of the Fire PRA. Although this may be true, a more detailed explanation is required since there are many other aspects of equipment/component/system performance/interactions that may require them to be considered part of the FPP. For instance, a Diesel Fire Pump may be credited in the Fire PRA as an injection source to supply raw water to either the Steam Generators in a PWR or the Reactor in a BWR, but it would be inappropriate to not consider the pump part of the FPP (clearly its primary function).