

Comments on FAQ 07-0032:

With regard to GDC 3:

The section of the Statements of Consideration (SOC) quoted in this FAQ does an excellent job of documenting how implementing a FPP in accordance with 10 CFR 50.48(c) satisfies the requirements from GDC 3 regarding post-fire safe shutdown systems: "Systems, Structures and Components important to safety shall be designed to minimize, consistent with other safety requirements, the probability and effect of fires and explosions." It also does an excellent job of documenting how 10 CFR 50.48(c) satisfies the requirement: "Fire detection and fighting systems of appropriate capacity and capability shall be provided and designed to minimize the adverse effects of fires on structures, systems, and components important to safety."

What the SOC do not address are the other sections of GDC 3 and 10 CFR 50.48(a) that have not been discussed. For instance, GDC 3 includes the requirement "Noncombustible and heat resistant materials shall be used wherever practical throughout the unit....," indicating that some attributes of fire protection must apply everywhere, regardless of safety classification.

With Regard to 10 CFR 50.48(a):

As stated above, the SOC provide a very good explanation of how 10 CFR 50.48(c) satisfies section 10 CFR 50.48(a)(2)(iii): "(2) The plan must also describe specific features necessary to implement the program described in paragraph (a)(1) of this section such as: (iii) The means to limit fire damage to structures, systems, or components important to safety so that the capability to shut down the plant safely is ensured." This addresses post-fire safe shutdown.

The remainder of the requirements of 10 CFR 50.48(a) are not addressed. One of the requirements that is not addressed is 10 CFR 50.48(a)(1)(iv) which states: "This fire protection plan must: (iv) Outline the plans for fire protection, fire detection and suppression capability, and limitation of fire damage." This requirement is a general requirement that is not focused on safe shutdown systems. It does not have the words important to safety or safety related. It is a requirement to have a fire protection plan that addresses general fire protection throughout the plant.

10 CFR 50.48(a) also has requirements that are not addressed by NFPA 805:

"(3) The licensee shall retain the fire protection plan and each change to the plan as a record until the Commission terminates the reactor license. The licensee shall retain each superseded revision of the procedures for 3 years from the date it was superseded" (emphasis added).