AGENDA

NFPA 805 Pilot Observation Visit
Public Meeting

November 8, 2007

US NRC Region II
Sam Nunn Atlanta Federal Center
Room 24T20
61 Forsyth Street, SW
Atlanta, GA 30303-3415

0830 Welcome from Region II Management

0835 Status of NFPA 805 Transition Pilot Program

0840 Multiple Spurious Operation Risk-Informed Methodology

0900 HRAs & Manual Operator Action Reconciliation Process

0920 Fire Scenario Development - Zone of Influence/Fire Origin Placement

0940 Break

0950 Treatment of Non-Power Operations

1000 License Amendment Request Template & FSAR Content Outline

1015 Existing Engineering Equivalency Evaluations

1035 Monitoring/Configuration Management

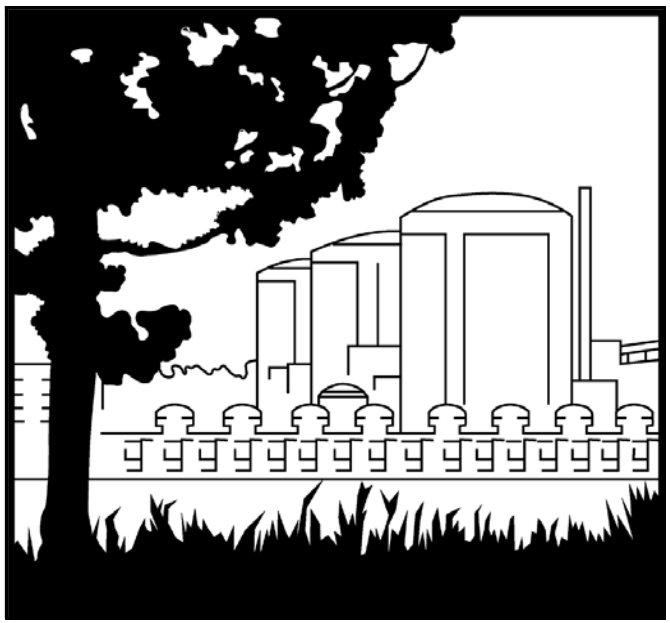
1055 Review of Outstanding and New Parking Lot Issues

1115 Questions

1130 Adjourn

ENCLOSURE

Oconee NFPA-805 Technical Update



By:
David Goforth
NFPA-805 Technical Manager
November 5, 2007

Overall

- Oconee Unit 3 identified as the pilot unit. ONS 1 & 2 to be submitted as part of the LAR with ONS-3
- Reconstitution
- B-1 Table
- B-2 Table
- B-3 Table
- Radioactive Release
- Non-power Ops
- PRA
- Configuration Control and Documentation
- LAR and UFSAR

NFPA 805 Implementation
August Pilot Observation Meeting
Harris Transition Status

Jeff Ertman, Transition Project Manager

Public Meeting

November 8, 2007, Atlanta, GA

Note: No commitments are made by Progress Energy presentations.

NGG Nuclear Generation Group

Progress Energy

NFPA 805
Harris Status - Current Focus

- Fire PRA completion
- Transition Change Evaluations
- Resolution of Multiple Spurious Operations (MSOs) and Operator Manual Actions (OMAs)
- Fire Safety Analysis (FSA) Completion
- Non-Power Operations Analysis
- Prepare draft LAR, FSAR
- Developing Monitoring Process Detials

NFPA 805
Harris Status - Key Milestones

- Complete ‘Rough in’ FSA – November 2007
  - Initial PRA Quantification complete
  - Draft Transition Program Changes
  - Initial mod scope identified
- Internal Event PRA Limited Peer Review – December 2007
- Fire PRA NRC Staff Review – February 2008
- LAR enter internal review – April 2008
- LAR submittal to NRC – May 31, 2008
- Fire PRA Update – 2nd QTR 2009
- NFPA 805 Program Implementation – 3rd or 4th QTR 2009
- NFPA 805 Modifications complete – December 31, 2010

NFPA 805
PE Summary

- Harris Transition is in the final data development and analysis phase
  - Fire PRA
  - FSA
- Need to lock down the post transition licensing basis during the next 5 months
- This meeting key NRC feedback opportunity

Questions

Multiple Spurious Operations Methodology / Frequently Asked Question (FAQ) 07-0038

Keith Began, CES/FP
November 8, 2007
Atlanta, GA

NGG Nuclear Generation Group

Progress Energy

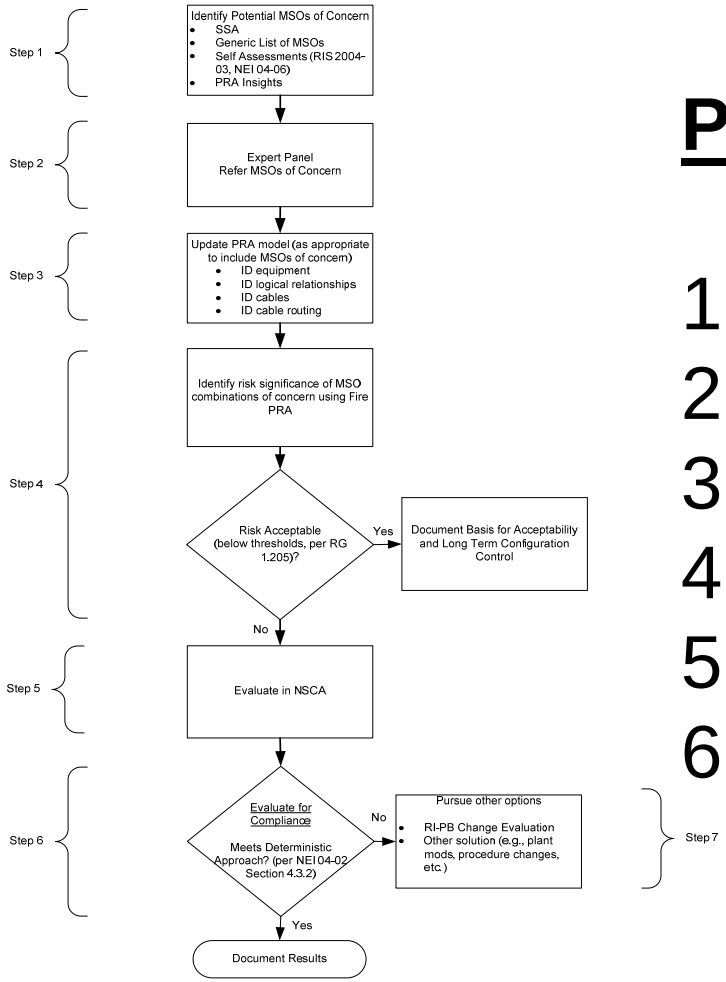
FAQ 07-0038 Lessons Learned on Multiple Spurious Operations (MSOs)

- Presentation Outline
  - Purpose of FAQ 07-0038
  - Discussion of proposed process
  - NRC Comments on FAQ 07-0038, Rev. 0

Purpose of FAQ 07-0038

- Provide updates to NEI 04-02 for lessons learned on scoping MSOs from pilot plant activities, NFPA 805 TF, NRC reviews, & PRA development
- Provide a structured process to allow application of endorsed criteria
- FAQ 07-0038, Rev. 0 submitted to NRC 9/20/07 (ML072740262)
- NRC comments provided on 10/18/07

FAQ 07-0038 Proposed Process



Process – 7 Steps

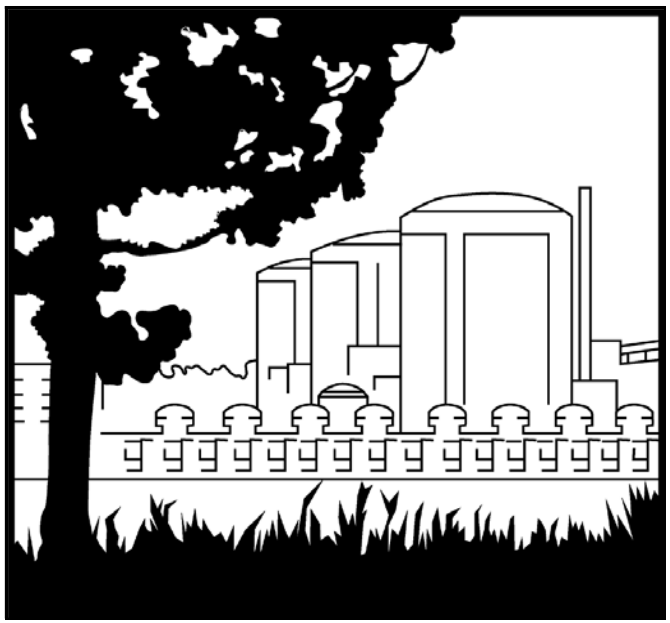
1 - Identify Potential MSOs
2 - Expert Panel
3 - Update FPRA model
4 - ID Risk Significant MSOs
5 - Evaluate in NSCA
6 - Evaluate for Compliance

NRC Comments on FAQ 07-0038, Rev. 0

- Editorial and Clarification Items
- Risk threshold clarification
- DID and Safety Margin Scope
- Documentation and Configuration Control
- Integration of MSOs and Operator Manual Actions

Questions

Overview of MSO Risk Significance Determination Process



Atlanta NFPA 805 Pilot Meeting
Nov. 5 – 8, 2007

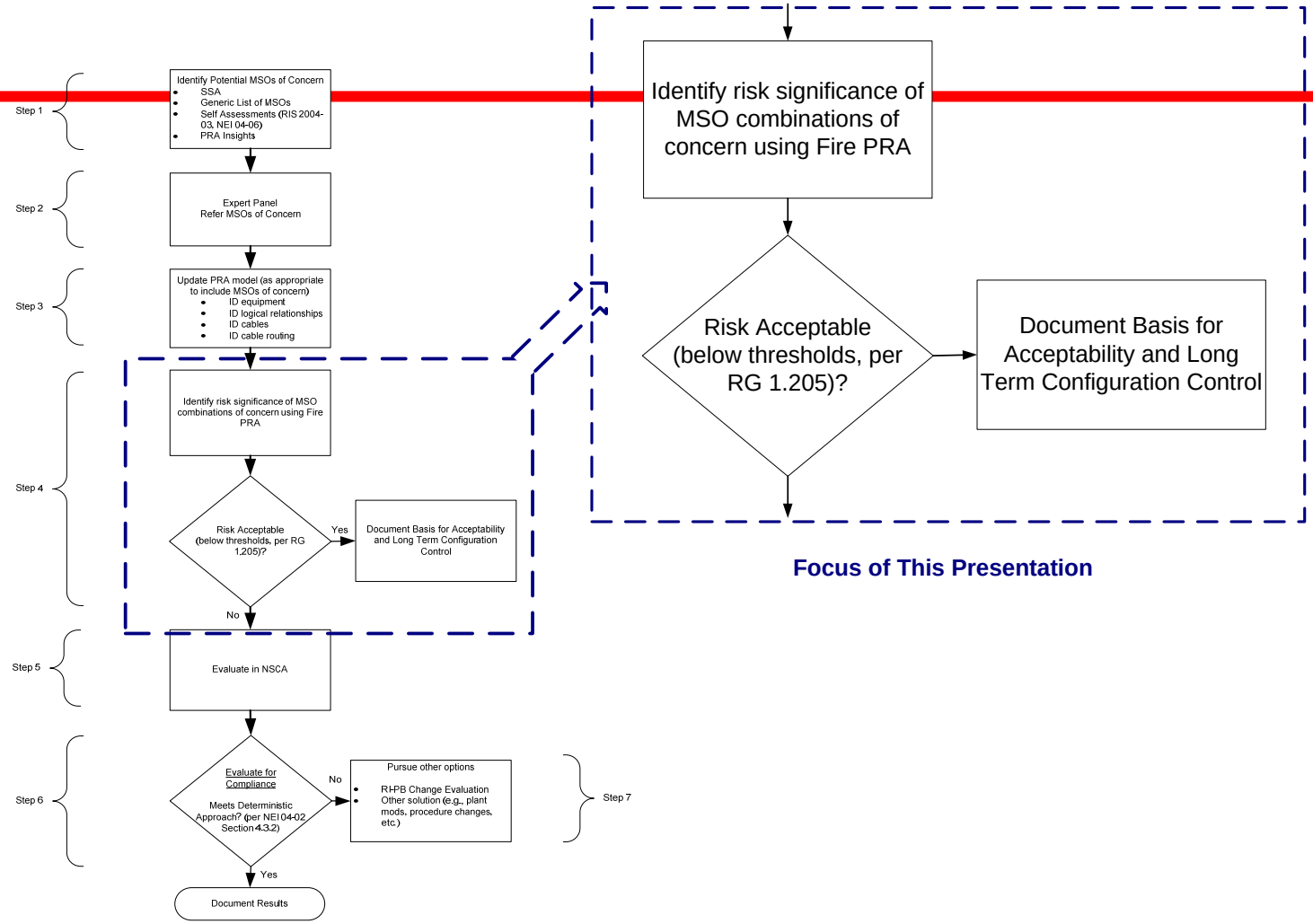
Agenda

- NEI 04-02 Requirements
- Risk Determination Process
- Post-Processing of Fire PRA Results
- Reporting of MSO Risk Insights
- New MSOs after FPRA Completion
- Summary

2

AR1

NEI 04-02 - FAQ 07-0038



Focus of This Presentation

3

Slide 3

AR1 here's a graphic from the faq that you can use if you want

Andy Ratchford, 10/6/2007

Risk Determination Process

- Assessment based on quantification results (cutsets)
- Identification of events representing a spurious operation (SO)
- ‘Read’ entire cutset file to find unique MSO combinations
- Summation of cutsets for each unique MSO combination
- Compare figure of merit for each MSO combination against NEI 04-02 / FAQ 07-0038 criteria

4

Summary

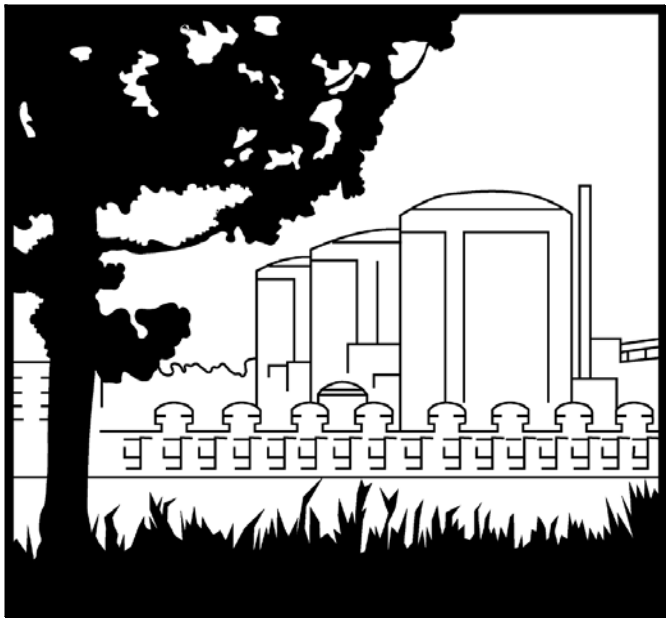
- Identify Potential MSOs of Concern
- Treat MSOs in Fire PRA
- Evaluate MSOs using Fire PRA
- Assess Risk Metrics
- Establish Licensing Basis for MSO
- Resolve MSO Issue
- MSO treatment update – may require Fire PRA Update

5

Operator Manual Action Reconciliation:

With a Focus on Determining the Scope of Change Evaluations

November 6, 2007



Overview

- Purpose of Operator Manual Action (OMA) Reconciliation
- OMA Change Evaluation Scope
- Oconee FAQ 06-0012 Binning Examples

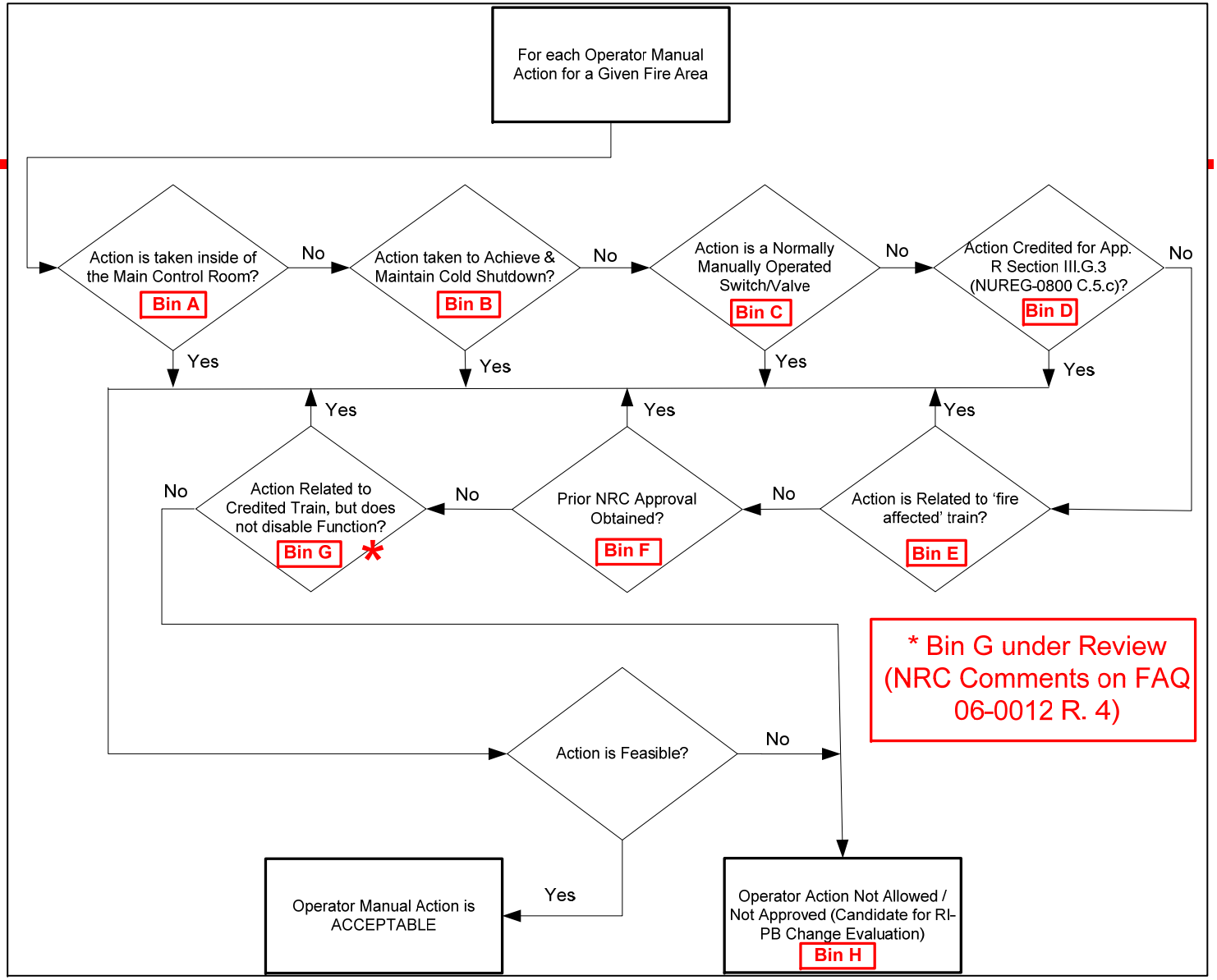
Purpose of OMA Reconciliation

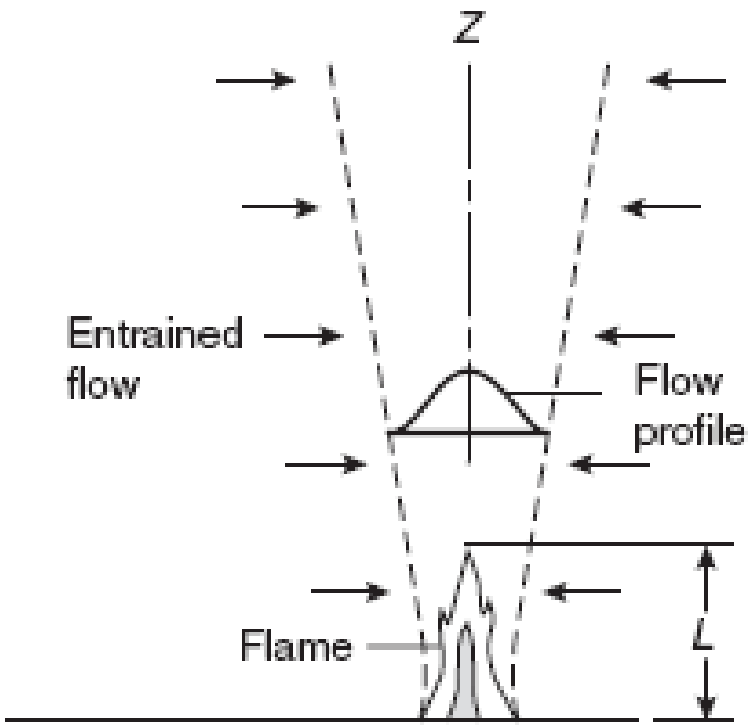
- NFPA 805, Section 4.2.4, in reference to the use of OMAs for the performance based approach states “additional risk presented by their use shall be evaluated.”
- Process can contribute to safety by eliminating unnecessary OMAs
- **Presentation Focus: Determine which compliance strategy OMAs are allowed and those that require change evaluation**

OMA Change Evaluation Scope

- OMAs that are either not allowed under the current regulatory framework or for which there is no previous NRC approval are not compliant with current regulations.
- NEI 04-02 FAQ 06-0012 clarifies which operator manual actions that will require change evaluations during the transition to NFPA 805.

FAQ 06-0012 Background





Generic Fire Modeling Treatments

November 6, 2007

Overview

- Define the treatments
  - What are they?
  - Why were they developed?
  - What are they used for?
- Describe the basis for each treatment
- Describe the process by which they are applied

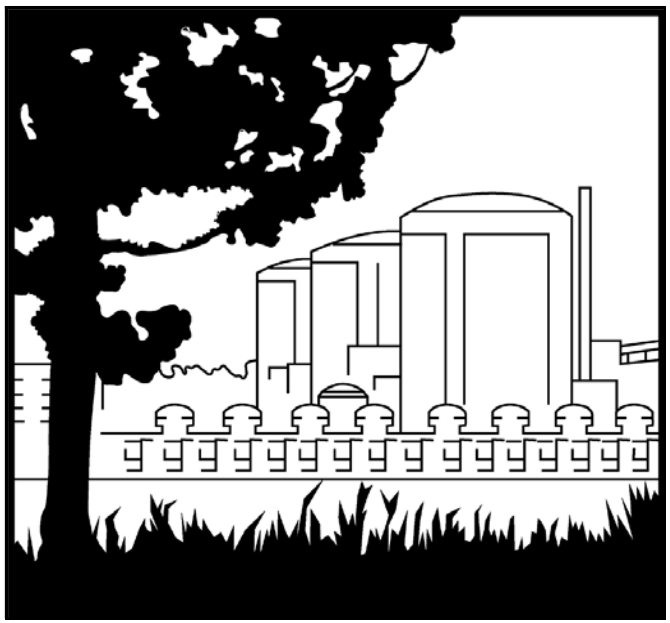
Generic Fire Modeling Treatments

- Pre-solved mathematical solutions
  - Simple correlations/zone computer models
  - Conservatively biased/full parameter sensitivity evaluation
  - Range set to accommodate most applications
    - Fully specified limits of applicability for each treatment
- Eight distinct computation areas
  - Fire scenario and fire scenario effects
- Developed to allow efficient determination of zone of influence in the field

Field Use of Generic Treatments

- 3-page field note form with procedure
- Cross-indexes NUREG 6850 Ignition Source Bins with eight generic treatment cases
- Selects ZOI using a bounding treatment heat release rate bin for the field notes
- Defines limits of applicability
- Provides an option for more refined ZOI
  - Consult tables and graphs in generic treatment report
- Detailed analysis may be required:
  - Exceed limits of applicability or higher resolution result is needed

Oconee Non-Power Operations



By:
David Goforth
NFPA-805 Technical Manager
November 6, 2007

Shutdown Risk Management

- The likelihood of an adverse event is best reduced by maintaining a balance between prevention and mitigation strategies. Shutdown Risk is minimized by implementing a program that contains the following elements outlined in NUMARC 91-06 and Generic Letter 88-17.
  1. Preserving Shutdown Key Safety functions through Defense in Depth
  2. Effective Risk Management
  3. Awareness and planning of High Risk Evolutions
  4. Appropriate involvement of organizations and disciplines in schedule development and review
  5. Effective communication of plant status
  6. Effective control of outage activities

FAQ 07-40

The strategy for additional controls/protection of equipment during non-power operations will be based on configurations or Plant Operating States (POS) during the outage where the risk is intrinsically high. The point of the strategy will be to evaluate and manage the risks of a fire, but not necessarily when the plant is more susceptible to an event causing the loss of a key safety function (KSF). Rather, the strategy should address configurations during which there is a high risk associated with the loss of a KSF. This takes into account the consequences of the loss of a KSF, not just the increased likelihood of the loss of a KSF. During periods of low risk normal risk management controls, processes and procedures will be utilized.

Non-Power Operations Update
NFPA 805 Pilot Observation Meeting

Bob Rhodes, Harris Plant

Public Meeting

November 8, 2007, Atlanta, GA

NGG Nuclear Generation Group

Progress Energy

Non-Power Operational Mode Review Previous Pilot Meeting Discussions

- Described Project Procedure FPIP-0126.
- Defined High Risk Evolution and Plant Operational States (POS) to be considered.
- Identified Key Safety Functions of interest.
- Status of equipment selection and additional circuit analyses.
- Results of a trial run for Fire Area with known “pinch points”.

Non-Power Operational Mode Review Current Status

- SSA Database modified and updated to be used in performing NPO reviews.
- An initial review (first round) of all Fire Areas completed.
- Draft of NPO Analysis prepared.
- Second round of reviews to be performed.

Non-Power Operational Mode Review FSSPMD

- NPO component information added to database.
  - Additional components not required for SSA.
  - Components with different functional state than for a post fire safe shutdown.
  - Components can negatively impact more than one KSF path
- NPO Separation Report made available.
  - Report similar to SSA Compliance Report.
  - Report by Fire Area.
  - Separated by Key Safety Function (KSF).

Non-Power Operational Mode Review Fire Areas Reviewed

- Fire Area reviews were performed utilizing:
  - Guidance provided in project procedure FPIP-0126, “NPO Modes Transition Review”
  - Draft version of FAQ #07-0040, “Non-Power Operations Clarifications”
- NPO Separation Report prepared and reviewed to identify KSFs and KSF paths that may be impacted in each Fire Area.

Non-Power Operational Mode Review Fire Area Reviews (cont.)

- Reports reviewed along with SSA to identify systems, components, and compliance strategies credited for that Fire Area.
- Analyzed components affected for each KSF to determine if it would be available to support the KSF.
- Identified KSF paths with “pinch points”.
- Matrix of KSF paths affected by Fire Area prepared.
- KSF Summary Report

Non-Power Operational Mode Review Draft Analysis

- Results of preliminary review documented in a NPO Modes Review calculation.
  - Methodology used and procedures reviewed described.
  - Plant Operational States considered are identified.
  - Findings and possible “pinch points” identified.
  - Recommendations for resolving findings and “pinch points” provided.

Non-Power Operational Mode Review Second Round

- Additional NPO components identified during review, and some that can be deleted.
- KSF associations to be re-aligned.
- Update NPO calculation.

Non-Power Operational Mode Review Defining Compliance to NFPA 805

Identify Pinch points

Provide Defense in Points

Maintain analysis

Harris Nuclear Plant
NFPA 805 Transition
License Amendment Request / Transition Report

Jeff Ertman, Progress Energy
David Goforth, Duke Energy
November 8, 2007 Atlanta, GA

HNP LAR / Transition Report

- Overview of Requirements/Guidance
- Outline of LAR / Transition Report (Focus on LAR)
- Itemized discussion of Draft LAR content

HNP LAR / Transition Report Requirements/Guidance

- 10 CFR 50.48(c)(3)(i)
- 10 CF R 50.48(c)(2)(vii)
- 10 CFR 50.48(c)(4)
- 10 CFR 50.90
- Reg. Guide 1.205 (C.2.2, C.3.1)
- NEI 04-02 (4.6, Appendix H)

License Amendment Request Template Background

- Used NEI 04-02 App. H as template
- Updated NEI 04-02 App. H template to reflect additional guidance in RG 1.205
  - FP License Condition
  - Reporting Requirements
- Updated NEI 04-02 App. H template to reflect Pilot Plant activities, FAQs, etc.

License Amendment Request
Major Sections

- FP License Condition
- Other License Condition
- Technical Specifications
- Orders & Exemptions
- Use of RI-PB Methods for NFPA 805 Ch. 3 Compliance
- Use of RI-PB Alternatives (non-NFPA 805 methods)
- FP Program Changes and Risk Impact
- USAR Changes
- Modifications

License Amendment Request Major Sections (cont'd)

- Clarification of Prior NRC Approvals
- EEEEs
- Circuit Analysis Methodology (MSO Resolution)
- OMA transition to Recovery Actions
- Power Block Definition
- Role of the FAQs
- FPRA Review High Level Findings and Resolutions
- Transition Schedule

Transition Report Template Background

- Used NEI 04-02 App. H as template
- Updated NEI 04-02 App. H template to reflect additional guidance in RG 1.205
- Updated NEI 04-02 App. H template to reflect Pilot Plant activities, FAQs, etc.
- Proposed to be provide the ‘next level of detail’ to supplement the LAR

Transition Report Outline

- 1 - Introduction
- 2 - Overview of Existing FPP
- 3 - Transition Process
- 4 -Demonstrations of Compliance with NFPA 805 Requirements
- 5 -Post-transition FP Licensing Basis
- Appendices

Transition Report Outline (cont'd)

- Appendices
  - A – NEI 04-02 Table B-1
  - B – NEI 04-02 Table B-2
  - C – NEI 04-02 Table B-3
  - D – NEI 04-02 Table F-1
  - E – NEI 04-02 Table G-1
  - F – MSO – Resolution Methodology
  - G – OMA – Transition
  - H – FAQs – Summary Table
  - I – Power Block Definition

Transition Report / LAR Challenges / Decisions

- What level of detail to include in the LAR and Transition Report?
- Will the Transition Report be an attachment, enclosure, submittal, etc.?
- What information will be duplicated in both the LAR and Transition Report?
- What information from the LAR and Transition Report will become ‘living documents’ (e.g., FSA, UFSAR, etc.)?

NFPA 805 NRC Pilot Observation Meeting Final Safety Analysis Report (FSAR) Content

Mike Fletcher, Progress Energy, HNP
David Goforth, Duke Power
November 7, 2007
Atlanta, Georgia

Current Guidance

- Current FSAR Contents
  - Reg. Guide 1.70, *Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants*
    - 9.5.1 Fire Protection
      - 9.5.1.1 Design Bases
      - 9.5.1.2 Systems Description
      - 9.5.1.3 Safety Evaluation (Fire Hazards Analysis)
      - 9.5.1.4 Inspection and Testing Requirements
      - 9.5.1.5 Personnel Qualifications and Training

NFPA 805

- The LAR /Transition Report should contain:
  - A discussion of the changes to Updated Final Safety Analysis Report (UFSAR) necessitated by the license amendment, and
  - A statement that the changes will be made in accordance with 10 CFR 50.71(e).

New FSAR Objectives

- Establish a concise new licensing basis for FP Program.
- Supersedes CLB and previous exemptions and SERs.
- Incorporation by reference of appropriate 805 transition Tables and Calculations in required sections

Level of Detail

- 9.5.1.1 Design Bases Summary
  - NFPA 805
  - Fire Safety Analysis (FSA)
  - Upper Tier Design Documents (DBD, etc.)
  - Define Codes of Record utilized

Level of Detail

- 9.5.1.2 System Descriptions
  - NEI 04-02 B-1 Tables, by Reference
  - NFPA 805 required detection and suppression systems
  - Identification of NFPA 805 required passive separation
  - Identification of “Power Block” structures

Level of Detail

- 9.5.1.3 Safety Evaluation (Fire Hazards Analysis)
  - High level description of approach and point to Fire Safety Analysis (FSA) sections as needed

Level of Detail

- 9.5.1.4 Inspections & Testing Requirements
  - NEI 04-02 B-1 Tables, Incorporated by Reference
  - Incorporate by reference surveillance guidance documents
  - Monitoring

Level of Detail

- 9.5.1.5 Personnel Qualifications & Training
  - NEI 04-02 B-1 & G-1 Tables, Incorporated by Reference
  - Upper Tier Documents noted in B-1 Tables
    - Program Management documentation
    - Fire Brigade Program

FSAR Content

Questions ?

NFPA 805 Transition HNP Pilot Transition Of Existing Engineering Equivalency Evaluations

November 6, 2007

Mike Fletcher, HNP

NGG Nuclear Generation Group

Progress Energy

Purpose

Describe the transition process for Existing Engineering Equivalency Evaluations (EEEE's)

- Guidance
- Scope
- Adequacy Review Process
- Documentation
- HNP Results / Examples

Guidance

- NEI 04-02 (Reference 2.4) Section 4.1.1 states in part:

"The extent to which the pre-transitional fire protection licensing basis can be incorporated into the new NFPA 805 licensing basis is determined by the extent to which the fire protection CLB can be shown to comply with the requirements in NFPA 805. However, exceptions are permitted for the following licensee specific deviations from NFPA 805 requirements:

  - *Existing Engineering Equivalency Evaluations [NFPA 805 Figure 2.2]. Note the licensee will review these equivalency evaluations during the transition process to ensure the quality level and the basis for acceptability is still valid."*

Guidance (Cont)

- Proposed FAQ 07-0033
- EEEE's performed per the appropriate application of current deterministic guidelines (Generic Letter 86-10) and evaluated under 50.59 and/or the Standard License Condition can be transitioned.
- EEEE's are not considered previously approved by the NRC.

Scope – Summarized in LAR

- Not in Scope - EEEE's which document "rated " or "compliant" conditions.
- In Scope-EEEE's which use performance based evaluations.

Adequacy Review Process

- Process documented in FPIP-0125.
- Review performed by independent FPE.
- EEEE's that don't meet adequacy review…
  - Can be reworked to meet acceptance criteria.
  - Can be included in transition as a "change".

Adequacy Review Process (Cont)

- Acceptance Criteria- NEI 02-03, Appendix A & FAQ 07-033 (Proposed)
  - The engineering evaluation should not be based solely on quantitative risk evaluations.
  - The engineering evaluation should reflect the current plant configuration or bound changing plant conditions.

Adequacy Review Process (Cont)

- The engineering evaluation should be an appropriate use of the engineering evaluation process.
- The engineering evaluation has been evaluated against the criteria in the pre-transition standard fire protection license condition, 10 CFR 50.59, or plant specific process used to determine the impact of the change/condition on the ability to achieve and maintain post-fire safe shutdown.

HNP Results

- 34 EEEE's identified for adequacy review
- All identified EEEE's performed since 1999.
- 21 identified as adequate during first pass.
- 8 have minor items which need clean up, typo's, minor clarifications.
- 5 still under review.

Questions

Harris Nuclear Plant (HNP)
NFPA 805 Transition

NFPA 805 Monitoring Program

Keith Began, CES/FP

November 8, 2007

Atlanta, GA

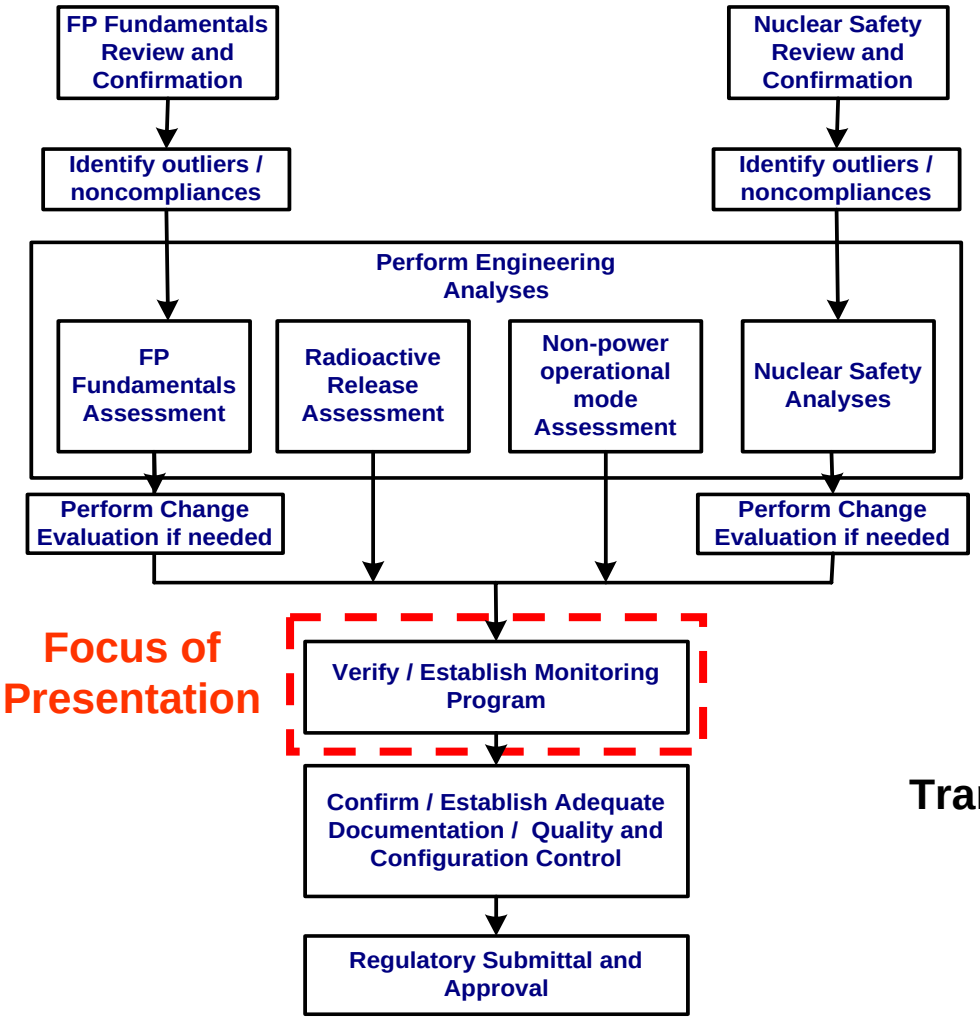
NGG Nuclear Generation Group

Progress Energy

NFPA 805 Monitoring Program Overview

- Purpose
  - Initiate discussion on NFPA 805 Monitoring Program Requirements
- Discussion Topics:
  - Requirements
  - Considerations

NFPA 805 Monitoring Program Overview



NEI 04-02 – Figure 4-1
Transition Process (simplified)

NFPA 805 Monitoring Program Requirements

- NFPA 805, Section 2.2.10 states:

  "A monitoring program shall be established to assess the performance of the fire protection program in meeting the performance criteria established in this standard."

- NFPA 805, Section 2.6 states:

  "A monitoring program shall be established to ensure that the availability and reliability of the fire protection systems and features are maintained and to assess the performance of the fire protection program in meeting the performance criteria. Monitoring shall ensure that the assumptions in the engineering analysis remain valid."

NFPA 805 Monitoring Program Considerations

- Align with existing programs and processes
  - Eliminate/minimize need for new, separate processes
- Consider the **Human Performance** aspects of our people in the field
- May use Maintenance Rule-“like” type program
- One method may not fit all attributes
- Use Leading Indicators (if determined)

NFPA 805 Monitoring Program

Questions

NFPA 805 Transition Observation Meeting Atlanta, GA – November 5 – 8, 2007 – Updated Parking Lot							
No.	**Topic**	**Assigned To**	**Action**	**Schedule**	**Action Taken**	**Meeting Discussion**	**FAQ Action**
1	How will Reactor Oversight Process deal with multiple spurious operations? Low significance vs. high significance. Philosophical approach for RI-PB treatment of multiple spurious operations is in NEI 04-02. 'Endorsement' of process will be accomplished via Reg. Guide.	Duke / Progress	ROP (new) / NEI 04-02 Methodology for Expert Panel Update Markup to P. Lain 3/28/06 flowchart Review of MC 0612	Feb. 2008 (Ertman)	NRC (Paul Lain) presented flowchart for "unevaluated Multiple Spurious operations" on 03/27/06. It included a screening process that included CAP and comp. measure inclusion, and documentation of the issue as a potential URI based upon risk significance.	Concerns and questions were raised about the process and the burden associated with URIs. Look at minor violation questions for MC 0612 – to see if 'potential multiple spurious operation findings' are adequately addressed. 1E-08 threshold for screening. Is it an appropriate value to use and consistent with the ROP? (NEI 04-02, NUREG-6850. RG 1.205) Pilot plants to provide comments on NRC flowchart and potential changes to NEI 04-02. Pilot Plants to provide Update by Feb. 2008 Provide feedback to NRC on this process for April 2008 Pilot Meeting	Potential
44	Consider establishing a NEI site for U.S. Nuclear Regulatory Commission (NRC) review of pilot material	NEI	NEI to determine logistics and capability.	August 2007 NEI TF meeting		Consideration is being given to setting up a location at NEI to allow NRC staff and contractors to review pilot-plant material. This will enhance the review of required material while allowing the plants' proprietary, security, and business sensitive information maintained under appropriate controls. Staff recommended process used previously for Reg Guide 1.200. NRC requested more than a single laptop for the reviews of detailed material (i.e., PRA info) at the 8/8/07 Pilot meeting.	

NFPA 805 Transition Observation Meeting Atlanta, GA – November 5 – 8, 2007 – Updated Parking Lot							
No.	**Topic**	**Assigned To**	**Action**	**Schedule**	**Action Taken**	**Meeting Discussion**	**FAQ Action**
49	NUREG/CR 6850 Kerite FR is 237°C not 372°C	NRC	NRC Provide information to public domain July 2007) and eventually provide errata sheet.	Sept. 2007 (Fletcher)		NUREG/CR 6850 Table H 3 and H 4 incorrectly lists the Kerite failure temperatures as being between 372°C -382°C with a Recommended Failure Threshold of 372°C. The recommended Failure Threshold for Kerite should be 237°C. The tables need to be reviewed and an errata/revision issued for the NUREG/CR. 8/8/07 update – EPRI (Bijan N. reviewing the topic based on discussions with NRC Research staff) 11/07/07 update – ERATA sheet for NUREG 6850 distributed in Palo Alto Training	**[CLOSED]**
52	Potential coordination issues between License Renewal Application (LRA) and NFPA 805 transitions (License Amendment Request [LAR])	Progress	Progress Energy point of contact K. Heffner. Developing a detailed plan and schedule.	August 2007 (Heffner)		The Harris Nuclear Plant (HNP) will be submitting a LRA that will be reviewed between 10/08 – 06/09. The current schedule for the NFPA 805 LAR is for submittal in 06/08 with review through 12/08. An LRA locks down a license (i.e., an LAR would not be considered prior to approval of a submitted LRA. This scheduling conflict has not been resolved for HNP.	**[CLOSED]**

NFPA 805 Transition Observation Meeting Atlanta, GA – November 5 – 8, 2007 – Updated Parking Lot							
No.	**Topic**	**Assigned To**	**Action**	**Schedule**	**Action Taken**	**Meeting Discussion**	**FAQ Action**
61	HRA in general Questions arose of HEP screening values in NUREG/CR-6850.	Duke / NEI	DUKE/ERIN to organize PRA Task Force Call on methods being used HEP screening values.	8/23/07		**Update at 8/8/07 Pilot Mtg [spilt item 61 into two PL Items 61 and 62]** **11/07/07 Update – Harris and Duke PRA team to develop single combined approach to address HRA issue (due to NRC 12//03/07). Meeting tentatively scheduled for 12/06/07 at NEI.**	
62	How are the "new" instrumentation requirements in the new proposed revision to the ANS Fire PRA standard going to be addressed in a fire PRA used for NFPA 805 transition?	Duke / NEI		8/23/07 update		**Update at 8/8/07 Pilot Mtg [spilt item 61 into two PL Items 61 and 62]** New 'requirements' for instrumentation related to operator actions in the PRA are being introduced in the ANS FPRA standard. These 'requirements' exceed those in NUREG/CR-6850. Questions were raised on the manner in which this new information will be implemented in an NFPA 805 Fire PRA. **11/07/07 Update – Harris and Duke PRA team to include this issue in the 12/03/07 submittal. Meeting tentatively scheduled for 12/06/07 at NEI**	
63	NRC to review ability to revise RG 1.205 to address FAQs in spring 2007 to support Pilot Plant LAR reviews.	NRC / Lain		8/23/07 Pilot Mtg. (update)		Concerns were raised over RG 1.205 revision and ability to revise it in 2007. A tie to RG 1.200 was discussed as part of a reason that RG 1.205 may not be able to be revised.	
	Items started at Pilot Meeting (Atlanta, GA, November 2007)						
65	NRC questioned the location of the transient packages on the floor versus a treatment such as that in SDP (2 ft above the floor). The Fire PRA should have a basis for where the transient package is placed vertically.	Pilot Plants	Verify / document basis for vertical placement of transient fire (ZOI).	30 days			
66	The NRC questioned to 'placement' of transient combustible sources based on likelihood of the location (how hard is it to get to the location) being used rather than the 'pinch point' location that has the highest consequences.	Pilot Plants	Verify / document basis horizontal placement of transient fire (ZOI) in a location other than the 'pinch point(s)'.	30 days			

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No.	**Topic**	**Assigned To**	**Action**	**Schedule**	**Action Taken**	**Meeting Discussion**	**FAQ Action**
67	The NRC had some questions on interpretation of the FSA (B-3 tables) that were discussed and resolved with Progress Energy staff. In particular, there were questions on whether SG pressure control was specifically addressed in the B-3 table and the integrated impact on RCS inventory control. The use of valve numbers without descriptions may have led to the potential concern.	Progress Energy NRC	Progress Energy will ensure this is addressed within the B-3 tables. NRC to provide comments on B-3 table (FAQ 07-0039)				
68	The NRC questioned the desire to see documented MSO combinations on a fire area/scenario basis. The challenges associated with presenting this information were discussed and deferred to future presentations.	Pilots	Pilots to provide example of level of detail on submittal.	January Pilot Meeting			
69	The NRC questioned potential fire-induced RPS failures and potential consideration in the Fire PRA (IN 2007-07). Non-pilot plant issue.	Fire PRA Task Force	Fire PRA Task Force to ensure treatment is adequate in NUREG/CR 6850.	120 days			
70	NRC agreed to review the Generic Fire Modeling Treatment calculation in more detail (at the NEI offices).	NRC	NRC review generic treatment including fire placement guidance				
71	NRC requested that a parking lot item be created for the NRC to review the FSAR (level of detail, format, etc.) information in order to get an FAQ in place. Feedback necessary prior to January Pilot Meeting.	NRC	NRC review FSAR slides and provide feedback.	30 days			

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No.	**Topic**	**Assigned To**	**Action**	**Schedule**	**Action Taken**	**Meeting Discussion**	**FAQ Action**
72	FAQ to be submitted by NRC to clarify confusing/incorrect guidance in NUREG/CR 6850 on cabinets and propagation based on venting	NRC	NRC submit FAQ.	Dec FAQ Meeting			
73	Pilot plants to submit Ignition Source Characterization project instruction as part of pilot plant deliverables, etc.	Pilots	HNP/Duke submit ignition source processes to NRC.	30 days			
74	Verify that NUREG/CR 6850 and ANS Standard allows Bayesian update of fire frequency in both directions	NRC	NRC to review documents and provide results of review	30 days			