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**Date:** 11/14/2007 4:08:03 PM  
**Subject:** NFPA-805 Transition Enforcement Discretion Survey Response

Alex, Paul;

At the last FP Steering Committee meeting we discussed how many plants are expected to need a longer period of enforcement discretion for NFPA-805 implementation and the reasons for the longer time required. In order to obtain feedback on these questions, we sent out a survey to the 805 plants. The attached file summarizes the information we received from the survey.

I expect that Alex will use this information in any conversations he has with Jack Grobe on this subject.

Please call me with any questions.

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**Subject:** NFPA-805 Transition Enforcement Discretion Survey Response

**Creation Date** 11/14/2007 4:08:25 PM

**From:** "RILEY, Jim" <jhr@nei.org>

**Created By:** jhr@nei.org

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1666	11/14/2007 4:08:25 PM
ENFORCEMENT DISCRETION FEEDBACK FROM NFPA 805 PLANTS (4).doc	42496	
Mime.822	63843	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling

This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled

Block List is not enabled

Attachment 1:

## **ENFORCEMENT DISCRETION FEEDBACK FROM NFPA 805 PLANTS:**

### **Questions:**

The following questions were asked of those plants that intend to transition to 10CFR50.48(c) / NFPA-805:

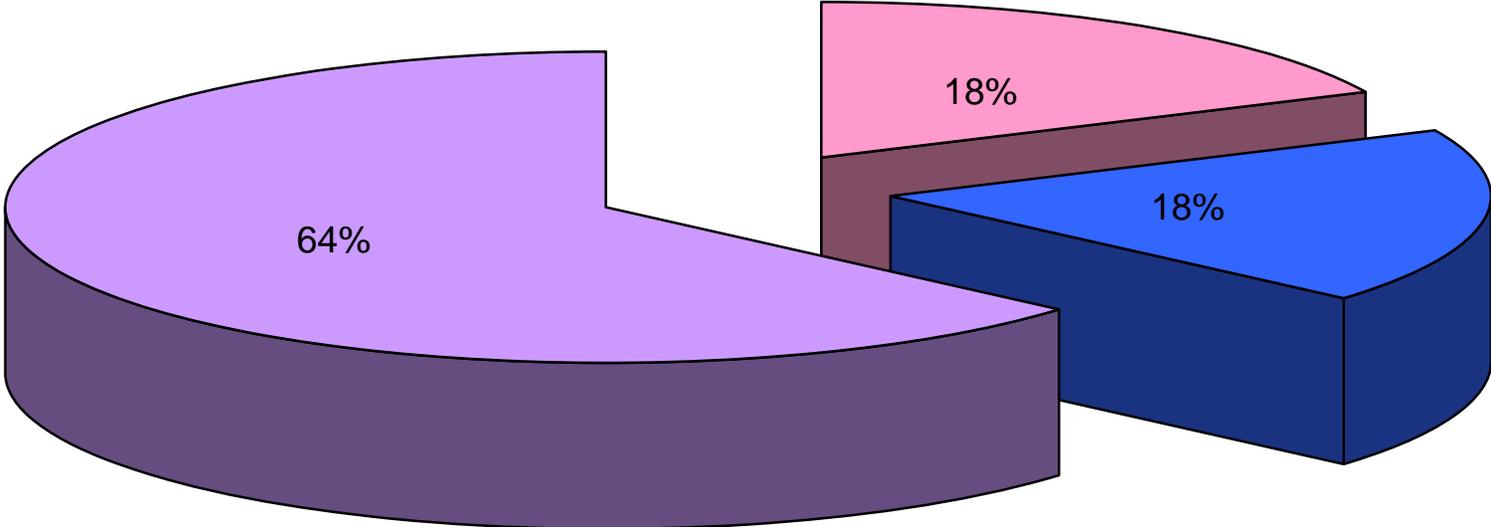
- ❖ If your plants were held to your existing enforcement discretion period, would you be able to complete the NFPA-805 LAR submittal in time (prior to the end of the enforcement discretion period)? Please respond separately for each plant.
- ❖ If you do not expect to be able to complete your LAR in time, please answer the following for each plant:
  - Why – what is the limiting resource?
  - How much additional time do you believe each plant will need?

The answers are summarized below.

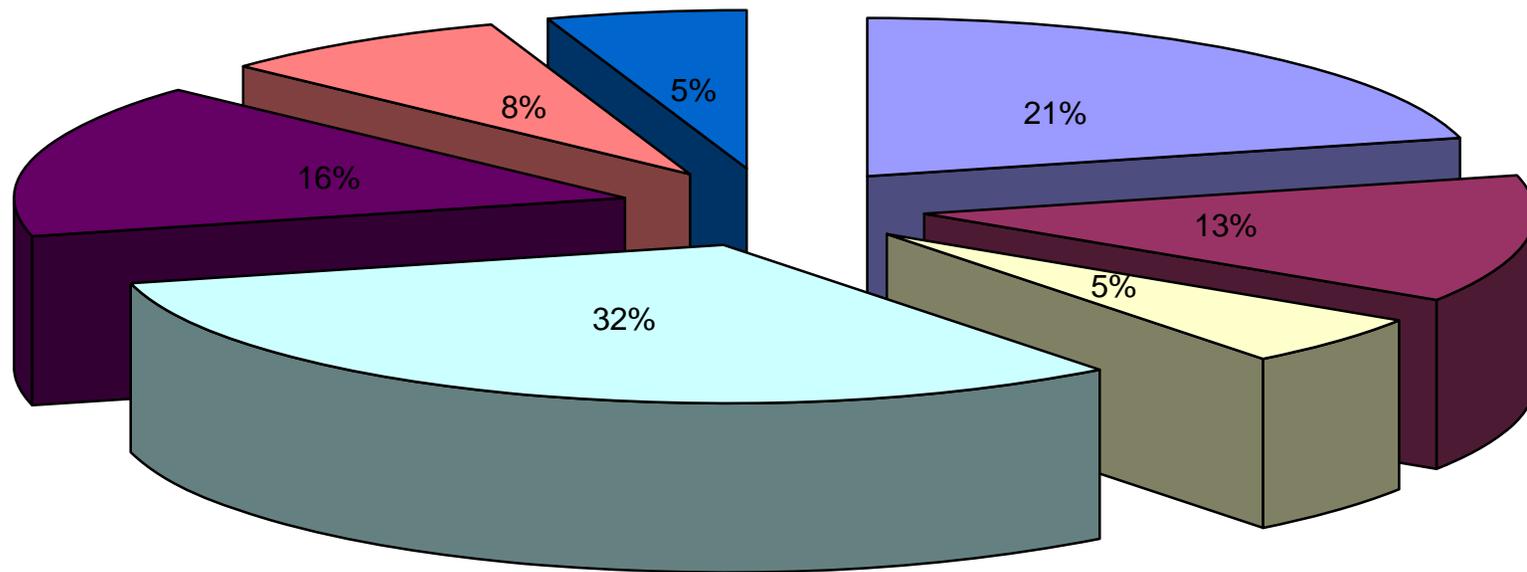
### **Summary:**

- ❖ 22/42 Units replied to these questions, representing 52% of transitioning plants. 23/32 of plants scheduled to submit LAR by the end of 2009, which represents 72% response.
- ❖ Overall position was that it will be a significant challenge to submit corresponding LARs on time given the current enforcement discretion period.
- ❖ Major challenges affecting submittal time continue to revolve around fire PRA quality including insufficient number of qualified PRA personnel, fire PRA peer review standard and performance of reviews, internal events upgrade to RG1.200, and just as importantly, the time to incorporate lessons learned from the pilots.
- ❖ Overall, at least 6 to 12 months of additional time would benefit the transition effort, not only to normalize the schedule, but to allow for adequate LAR function (solid submittal, RAI interaction, etc.).
- ❖ Summary charts below:

**Enforcement Discretion Extension Needs as Responded to by 66% of  
Plants Scheduled to Submit LAR by the End of 2009**



**Key Challenges Resulting in Need for Enforcement Discretion  
Extension as Responded to by 66% of Plants Scheduled to Submit  
LAR by the End of 2009**



- |                  |                     |                 |                     |
|------------------|---------------------|-----------------|---------------------|
| PRA Resources    | Fire PRA Resources  | Lessons Learned | Peer Review Process |
| RG 1.200 Changes | Corporate Personnel | PRA Upgrades    |                     |