

From: Daniel Frumkin
To: alan.holder@pgnmail.com
Date: 12/12/2007 9:26:56 AM
Subject: NRC Staff Comments on FAQ 06-0025 Rev.3

Alan,

Upon reviewing the current version of FAQ-06-0025, Revision 3, I have the following editorial and technical comments:

- 1 - Typo in bullet six of proposed addition text - "Top" instead of "to."
- 2 - Fourth column in table is from Appendix A of NFPA 805, but it is not labeled as such.
- 3- The FRACQA letter is oddly referenced, and would be better referenced by calling it Generic Letter 77-02.
- 4 - In the FAQ and the table, NUREG-0800 is referenced, but NUREG-0800 is too vague due to the many sections of NUREG-0800. Provide the section that is being referenced and the appropriate version.
- 5 - What is the technical justification for why the description of SSD equipment proposed in the FAQ is adequate compared to the guidance in RG 1.189 for SSD equipment?
- 6- Provide clarity regarding if the table goes into NEI 04-02, and if it goes in to NEI 04-02 where will it go?
- 7 - The NRC staff does not agree that the content of 3.4.2.1, "list of SSD equipment in the area" is adequately covered as described in the FAQ. Provide a technical justification how the guidance in the FAQ is adequate to supercede the content of 3.4.2.1. The proposed FAQ does NOT require a list of SSD equipment as required in the standard, provide a discussion of why this is acceptable.
- 8 - It would be useful for writing closure memo to have the reason for the FAQ added to the "circumstances" section. Why is the FAQ needed? During discussion during the last FAQ meeting I understood from the licensees that this FAQ was only to document the current licensing basis, but this could be done without prior NRC approval, so it is unclear why NRC approval is being requested.
- 9 - The submitted FAQ states for NEI internal use only.

This email will be placed into the NRC's ADAMS document management system and will be included with the other documentation for the NFPA 805 FAQ process.

Dan

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