

# Regulatory Guide 1.205

Elizabeth Kleinsorg  
Kleinsorg Group Risk Services, LLC

# Agenda

- ◆ Outline Regulatory Guide 1.205
- ◆ Incorporation into NEI 04-02

# Outline of RG 1.205

## A. Introduction

## B. Discussion

- ◆ Background
- ◆ Interim Enforcement Discretion
- ◆ FP Program Changes
- ◆ Appendices to NFPA 805
- ◆ Fire Probabilistic Safety Assessment

# Outline of RG 1.205 – Continued

## C. Regulatory Position

1. NEI 04-02
2. License Transition Process
  1. General
  2. License Amendment Request
  3. Existing Engineering Equivalency Evaluation
  4. Documentation of Prior NRC Approval
3. NFPA 805 FP Change Program
  1. Standard License Condition
  2. NFPA 805 Change Process
    1. Definition of a Change
    2. FP Program Change Evaluations
    3. Deviations from NFPA 805 Chapter 3 Requirements
    4. NRC Approval of FP Changes
    5. Plant changes w/o Prior NRC Approval
    6. Cumulative Risk of Changes  
NFPA 805 Change Process
  3. Circuit Analysis
  4. Physical Protection
4. NFPA 805 Analytical Methods and Tools
  1. General
  2. Fire Models
  3. Fire PRA