

In order to adequately capture the 1.189 discussion of Safe Shutdown Equipment fire preplans should consider the following additional item. This should be a new bullet under the last bullet.

- o the equipment and portions of the fire affected area where risk-informed or performance-based analysis rely on assumptions that could be affected by fire brigade performance.

Justification:

NFPA 805 permits crediting low combustible loading, small fires, and also fire brigade response. If the assumptions in the analyses are violated based on field conditions, the capability to safely shutdown may be affected. Therefore, these assumptions should be identified in the fire preplans. Possible examples of these assumptions are, designated areas of low combustible loading (pinch points), redundant equipment in the area where one piece of equipment must continue to operate during a fire (such as separation due to small distance or partial wall), etc. For this last example, it could be important for the fire brigade to know that the running pump one side of the partial wall must continue to operate to assure safe shutdown and the fire brigade must plan their attack such that they will not cause the running pump to fail due to suppression activities. Where significant distance or other physical protection is in place, there would be no need to include this information in the fire preplan.