

Page	Comment (Blue = suggested; Red = required)
3	Therefore, the strategy defined in NEI 04-02 will be <i>fire-risk-informed</i> ...
4	The following discussion provides the basis for identifying which plant configurations during NPO may prove to be more risk significant. Add a footnote to this, stating <i>Only NUREG/CR-6143 and -6144 considered fire (at a coarse screening level).</i>
10	...during low risk periods normal risk management controls and fire prevention / protection processes and procedures will be utilized. Add a footnote to this, stating <i>If an HRE is in progress, the NPO modes should not be considered low risk, and additional controls/measures should be evaluated.</i>
10	In footnote 2, ...that can be considered “intrinsicly high” when considering fire effects.”
11	In footnote 3, ...that can be considered “intrinsicly high” “higher risk evolutions” when considering fire effects.”
13	For POS 1 with SG Heart Removal Available in Table F-2, under Disposition: <i>Provide normal fire protection and prevention practices apply</i>) should read the same as in Table 1, namely <i>Provide appropriate fire protection/fire prevention.</i>
13	For both POS 1 and POS 2 in Table F-3, under Disposition: <i>Perform actions per NEI 04-02, Section 4.3.3</i> (consistent with Table 1)
14	At the end of Section F.3, add detail that is contained in Table F-1 here as well for consistency, i.e., the items under Process and Results for Step F.3 in Table F-1.
15	In the bullet section titled “During those NPO evolutions that are defined as HREs,” add the material from Table F-1 in the Process and Results column that corresponds to this section (Step F.4).
16	Add a last open bullet, as follows: <i>Reschedule the work to a period with lower risk or higher DID.</i>
20	Under Process and Results, third bullet down, there is a typo; change the word “the” to the word “that;” <i>Specifically identify those areas that cause the loss of all success paths for a KSF.</i>
20	Under the discussion on the use of Fire Modeling, there should also be consideration for Safety Margin in the discussion. The MEFS vs. LFS process should be referenced, or some discussion about margins in general. In order to “limit damage in a fire area,” there has to be some consideration of margin with respect to the accuracy/uncertainty of the model for that scenario. The modeler must be able to assure that the loss of the KSF is not in jeopardy (MEFS should be significantly less than the LFS).
22	Do the same as on page 16 (above) in Table F-1 under Implementing Guidance for the last part of Step F.4.
22	Open bullet <i>Plant lineup modifications (removing power from equipment once it is placed in its desired position)</i> reads differently from material in Section F.4, <i>Consideration of removing power from equipment once it is placed in its desired position to prevent spurious operation. Use the same wording in both places (whichever is correct).</i>