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499 South Capitol Street, SW, Suite 518, Washington, DC 20003 USA
Phone: +1 (202) 488-4428 • Fax: +1 (202) 488-4452 • www.nfpa.org

September 9, 2003

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SEP 12 2003

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Advisory Committee on Reactor Safeguards

**RE: Subcommittee on Fire Protection, Meeting September 9, 2003, Rockville, MD
Concerning 10 CFR 50.48 Rulemaking for the Voluntary Adoption of National
Fire Protection Association (NFPA) Standard 805 – Performance-based
Standard for Fire Protection for Light Water Reactor Electric Generating Plants,
2001 Edition.**

Dear Sirs:

On behalf of the National Fire Protection Association (NFPA) I am submitting this comment for the record of the meeting of the Nuclear Regulatory Commission's Advisory Committee on Reactor Safeguards, Subcommittee on Fire Protection. The meeting is being held to discuss 10 CFR 50.48 rulemaking to permit licensees to voluntarily adopt NFPA's Standard 805 – *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants*, 2001 Edition.

NFPA continues to support the adoption and use of NFPA 805 by the NRC and its licensees; and we would hope that the NRC would consider adoption of NFPA 805 as mandatory for licensees rather than voluntary as currently proposed. NFPA 805, as with all NFPA Codes and Standards, is a voluntary consensus standard, accredited by the American National Standards Institute and meets all the requirements established by Congress in the National Technology Transfer and Advancement Act (PL 104-113) which mandates federal agencies to adopt voluntary consensus codes and standards.

The technical committee that developed NFPA 805 includes representation and participation from the NRC, industry, public interests and other parties. We believe that this process establishes the best standard available to licensees of the NRC.

If I can provide additional information about NFPA or its codes and standards to the Advisory Committee please feel free to contact me at 202-488-4428 at the NFPA Government Affairs office in Washington, DC.

Sincerely,

John C. Biechman
Vice President, Government Affairs

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