

Comments on Step 2 (Conduct expert panel):

The current version of the FAQ points to NEI 00-01 Section F.4.2 for how to conduct an expert panel. However, it provides little specific guidance, so the section needs to be expanded to provide additional guidance on process for formulating, conducting, and documenting the results of the expert panel, i.e.,

- Identify the members of the expert panel, their qualifications/background, and their experience (e.g., PRA expert, system engineers, safe shutdown analyst, etc.)
- Describe the expert panel process (e.g., when it was held, what analyses were reviewed to identify MSOs, how was consensus achieved on which MSOs to keep, criteria used in decision process, etc.).
- Document the expert panel process results. This documentation should provide a list the MSOs that were included in the PRA and a separate list of MSOs that were not kept for further analysis (and the reasons for rejecting these MSOs for further analysis).

Comments on Step 3 (Update the Fire PRA model and NSCA):

No changes proposed. Just note that the Staff understands this step to include a description of the disposition of each MSO kept for further analysis, including an explanation if downselected MSOs are excluded from the fire PRA and NSCA.

Comments on Step 4 (Evaluate for NFPA 805 Compliance):

For each MSO evaluated in the fire PRA or using a performance-based approach crediting use of unallowed/unapproved OMAs (FAQ 06-0012 Bin H OMAs), describe how the time to implement Recovery Actions was addressed.

For each MSO having a delta CDF/LERF exceeding NEI 04-02 Section B.2.1 thresholds, provide the contribution to CDF/LERF.

Comments on Step 5 (Documentation Results):

The documentation to be provided to the NRC staff, whether as a separate report or as part of the LAR/Transition Report, should provide a detailed description of the MSO identification, analysis, disposition, and evaluation results (e.g., references used to identify MSOs; the composition of the expert panel, the expert panel process, and the results of the expert panel process; disposition and evaluation results for each MSO, etc.).