

- The proposed resolution utilizes one test trial in one study as the entire basis for the time to reach peak HRR (Test 3, from NUREG 4680).
 - Fire is very unpredictable, and as with most scientific processes, conclusions should generally not be drawn from one data point. What is the justification to do so in this case?
 - There are plenty of studies and lots of data available about trash can fires and other transient combustibles. There is no reason to base this off of one number. Most common liquid combustibles and cellulose products have known burning characteristics. Why were none of these properties considered?
- The graph referenced in NUREG-4680 (Figure 11a) does not report HRR; it is a Plume Temperature Curve for Test 3. Had the HRR versus Time curves for Tests 1 and 2 of the same study been referenced then the peak HRR would easily remain at 3 minutes.
 - What is there a justification for using Figure 11a only and instead of any other test in this study?
 - Why use a temperature curve when discussing HRR?
- Figure 11a pertains to Test 3 in this study. Are the authors aware that Test 3 and Fuel Package 3 are different? It seems that in discussion they are used interchangeably; however that is really not the case.
- In this study, there is a distinct pattern between tests where the containers used were polyethylene buckets (or trashcans) versus when a cardboard box was the container. Why did the authors choose to use a test where a bucket was used and not a trial where a cardboard box is used? Is there a reason why cardboard boxes with combustible contents would not be commonplace in a nuclear power plant?
- According to NUREG-4679: The burning characteristics for combustible materials found in nuclear power plants include: “cable insulation materials, flammable liquids, furniture, trash and general refuse, and wood and wood products”.
 - In this FAQ resolution there is only one composition and configuration considered, yet in the event database there are varied types of fires. In the table below a few examples of the assorted types of transient fire events that have occurred in the past are listed. Other examples can be found in the database.
 - With such varied contents and conditions, why was only one considered?

EVENT 1149	ACETYLENE LINE BROKE AND IGNITED THE ACETYLENE BOTTLE WHICH OVERPRESSURIZED AND THE BOTTLE BLOWOFF PLUGS BLEW OFF WHICH PREVENTED ISOLATING THE ACETYLENE.
EVENT 362	Empty resin barrels, wood, acid suits involved in fire of suspicious origin.
EVENT 1273	STRESS RELIEF HEATER IGNITED PAINT ON FLOOR
EVENT 46	A fire was discovered in a box of ping-pong balls. Started by a cigarette.

Event 1149, 362, and 46 are challenging fires that occurred in the TB. Event 1273 is undetermined.

- Why choose that particular test as typical or representative?
 - Other tests (1, 2, 5, 6) in the same program had "time to peak" that were lower, in the 2-3 minute range.