



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D.C. 20555-0001

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February 15, 2001

Memorandum TO: Mr. John D. Sieber, Chairman
Fire Protection Subcommittee

FROM: *Amarjit Singh*
Amarjit Singh, P.E., Senior Staff Engineer
ACRS/ACNW Technical Support Staff

SUBJECT: REQUEST FOR CONCURRENCE ON COMPREHENSIVE FIRE
PROTECTION REGULATORY GUIDE (DG-1097)

Attached is the copy of the staff's final version of the Regulatory Guide 1.XXX (Draft was issued as DG-1097), "Fire Protection for Operating Nuclear Power Plants". During the 471st meeting of the Advisory Committee on Reactor Safeguards, the Committee decided not to review the draft DG-1097. The staff issued the draft DG-1097 for public comments in June of 2000. The staff received approximately 317 comments from the Nuclear Energy Institute (NEI), nuclear industry, a number of consulting firms, Winston & Strawn Law firm, and an individual. The licensees generally supported the NEI comments, of which 67 comments were in the area of Backfit/Implementation concerns raised by NEI and the industry, 120 general comments were incorporated in the proposed final version of regulatory guide and the remaining 130 were not incorporated into the regulatory guide. The staff plans to publish the proposed final version of this regulatory guide on April 16, 2001, for industry use. The staff has requested ACRS review and comment on the attached proposed final version of the Regulatory Guide.

Following are the significant changes made to the regulatory guide from the comments received:

Background

The NRC's requirements and guidance for nuclear plant fire protection programs are promulgated in a number of regulations and supporting guidelines, including, but not limited to, General Design Criterion 3 (GDC), 10.CFR Part 50.48, Appendix R to 10CFR Part 50, regulatory guides, generic communications (e.g., Generic Letters, Bulletins, and Information Notices) NUREG reports, the Standard Review Plan (NUREG-0800) and associated Branch Technical Positions, and industry standards.

This regulatory guide was developed to provide a comprehensive fire protection guidance document and to identify the scope and depth of fire protection that the staff has determined to be acceptable for operating nuclear plants. This guide may be used for licensee self-assessments and as the deterministic basis for future rulemaking. Risk-informed and performance-based alternatives to the guidance presented in this regulatory guide may be acceptable to the NRC staff.

Major Changes From Comments Received

- The staff revised the implementation section of the regulatory guide to incorporate comments received from the NEI and the industry concerning backfitting. The staff added the statement, "No backfitting is intended or approved in connection with the issuance of this guide."
- Penetration Seal Inspection Frequency was changed to once every 10 years.
- 10CFR 50.59 reference was deleted.
- Safety relief valves/low pressure systems was classified as "Redundant" Shutdown Train for BWRs.
- Fire Brigade qualifications were revised per Arizona Public Service' comments which states, "Nuclear power plants staffed with a dedicated professional fire department may utilize a fire team advisor to assess the potential safety consequences of a fire and advise the control room and incident commander. The team fire advisor should possess an operator's or equivalent knowledge of plant systems and be dedicated to supporting fire incident commander during fire emergency events."
- The Life Safety Code reference was deleted.
- Defined "adverse effect" for fire protection license condition (FPLC) program changes. The term, "not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire, " means to maintain the safety margin that was previously reviewed and approved by the NRC.

Conclusions

I recommend that the proposed final version regulatory guide be issued for industry use and the Committee need not review this guide and issue a Larkinsgram.

If you have any questions please call me at (301) 415-6899.

Attachment: As stated

cc: ACRS Members
J. Larkins
J. Lyons
S.Duraiswamy