

# **NRC Planned Actions on NUREG-6850 Related FAQs**

**NEI NFPA 805 Workshop  
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# BACKGROUND

- **Regulatory Issue Summary (RIS) 2007-19, *Process for Communicating Clarifications of Staff Positions Provided in Regulatory Guide 1.205 Concerning Issues Identified During the Pilot Application of NFPA Standard 805***
  - “...a structured avenue to seek NRC staff interpretations and clarifications of NEI 04-02 guidance and NFPA 805 requirements, in accordance with 10 CFR 50.48(c), in a timely manner.”

# BACKGROUND

- NRC letter to NEI dated July 12, 2006 (ML061660105) describes the FAQ process in detail
  - Describes process for issue identification
  - Describes the public meeting discussions of the FAQs
  - Stresses that stakeholders work expeditiously and cooperatively

# STATUS OF ALL FAQs

- **Current FAQs are of the following types:**
  - Those that clarify staff positions described in RG 1.205
  - Those that have implications in the application of NUREG/CR-6850
- **FAQs facts - 40 total FAQs:**
  - 22 closed FAQs
    - 5 are related to NUREG/CR-6850
  - 11 open FAQs
    - 6 are related to NUREG/CR-6850
  - 7 withdrawn FAQs
    - Combined with other FAQs or determined to be no longer needed
- **6 additional issues have not been placed into the FAQ process**



# NUREG-6850 RELATED FAQs

- **NUREG-6850 related FAQs**
  - FAQs: Memorandum of understanding (MOU) between NRC's Office of Nuclear Regulatory Research and the industry's Electric Power Research Institute
  - FAQs: Non-MOU in the FAQ process

# INDUSTRY CONCERNS

- **Timeliness of some FAQ resolutions?**
- **Conservatism in NUREG-6850?**
- **Inclusion of PRA related questions in the FAQ process?**



# LIST OF NUREG 6850 RELATED FAQs

- **FAQ 35 (non-MOU)**
  - Subject: Bus ducts (High Energy Arcing Faults)
  - Status: Consensus reached
- **FAQ 42 (non-MOU)**
  - Subject: Fire propagation from electrical cabinets
  - Status: Part 1 – qualitative approach consensus reached;  
Part 2 – quantitative approach is Open
- **FAQ 43 (non-MOU)**
  - Subject: Fire source location inside electrical cabinets
  - Status: Consensus reached



# LIST OF NUREG 6850 RELATED FAQs (cont'd)

- **FAQ 44 (MOU)**
  - Subject: Main feedwater pump oil fires
  - Status: December 2008 EPRI Interim Report (under 'evaluation' by NRC)
- **FAQ 45 (MOU)**
  - Subject: Fire growth inside electrical cabinets
  - Status: Open
- **FAQ 46 (MOU)**
  - Subject: Very early warning smoke detection (aka incipient fire detection)
  - Status: December 2008 EPRI Interim Report (under 'evaluation' by NRC)



# **LIST OF NUREG 6850 RELATED FAQs (cont'd)**

- **FAQ 48 (MOU)**
  - Subject: Fire ignition frequencies
  - Status: December 2008 EPRI Interim Report (under 'evaluation' by NRC)
- **FAQ 49 (MOU)**
  - Subject: Cable tray fires
  - Status: Part 1 – within zone of influence (ZOI) near consensus; Part 2 – outside ZOI Open
- **FAQ 50 (MOU)**
  - Subject: Fire brigade response
  - Status: Open

# LIST OF NUREG 6850 RELATED FAQs

- **FAQ 51 (MOU)**
  - Subject: Duration of hot-short induced spurious actuations
  - Status: Open
- **FAQ 52 (non-MOU)**
  - Subject: Transient fires
  - Status: Part 1 – inside MCR consensus reached; Part 2 – outside MCR Open
- **FAQ 53 (non-MOU)**
  - Subject: Kerite cables
  - Status: Open

# WHAT DOES THE RULE REQUIRE?

- **10 CFR 50.48(c) *National Fire Protection Association Standard NFPA 805 – (1) Approval of incorporation by reference.***
  - National Fire Protection Association (NFPA) Standard 805, “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition” (NFPA 805), which is referenced in this section, was approved for incorporation by reference...”
- **NFPA 805, section 2.4.3.3, states “The PSA approach, methods, and data shall be acceptable to the AHJ”.**

# WHY INTERIM POSITIONS

- **Provide licensees with one acceptable approach, method or data**
  - Results in regulatory certainty, stability, and predictability
- **Does not limit licensees to use a particular approach, method or data**
  - An alternative approach, method, or data can be submitted by a licensee(s) but must stand on its own merits and be acceptable to the AHJ



# **NRC's PLANNED PATH FORWARD**

- **STEP 1: NRR and RES will jointly develop an interim position on each NUREG-6850 FAQ**
- **STEP 2: RES will work with EPRI under the MOU process for a defined time period**
  - Agreement
  - Agreement, but additional research is needed
  - Agree to disagree



# **NRC's PLANNED PATH FORWARD (cont'd)**

- **STEP 3: NRR will use the FAQ process to publish the interim position**
  - Submit the interim position as a proposed resolution to the NEI NFPA 805 Task Force
  - Provide for a comment time period (30 days)
- **STEP 4: NRR will publish a closure memo documenting our interim position**
- **STEP 5: If needed, RES will conduct additional research**



# PROPOSED SCHEDULE

- **FAQs 35, 42 (Part 1), 43, 44, 46, 48, 49 (Part 1), 50, 52 (Part 1)**
  - Closure memos planned for late 2Q, CY2009
- **FAQ 42 (Part 2)**
  - Closure memo early 4Q, CY2009
- **FAQ 45**
  - To be determined
- **FAQ 49 (Part 2)**
  - To be determined
- **FAQ 51**
  - Closure memo CY2009 (additional research likely)
- **FAQ 52 (Part 2)**
  - Closure memo early 4Q, CY2009
- **FAQ 53**
  - Closure memo CY2009



# QUESTIONS