



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

September 10, 1997

Mr. L. Joseph Callan
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Callan:

SUBJECT: DRAFT REGULATORY GUIDE DG-1069, FIRE PROTECTION PROGRAM
FOR PERMANENTLY SHUTDOWN AND DECOMMISSIONING NUCLEAR
POWER PLANTS

During the 444th meeting of the Advisory Committee on Reactor Safeguards, September 3-5, 1997, we reviewed the subject draft Regulatory Guide. During this review, we had the benefit of discussions with representatives of the NRC staff and of the document referenced.

Draft Regulatory Guide DG-1069 is intended to provide guidance to licensees for maintaining fire protection programs for nuclear plants that are permanently shut down and defueled, and are in the process of being decommissioned. Such guidance has not heretofore been available. The risk posed to the public by permanently shutdown nuclear plants is expected to be much reduced because of lower inventories of releasable radionuclides and lower energy densities available for the breach of barriers. On the other hand, barriers to the release of radionuclides in the shutdown plants are less numerous and less robust. Also, the frequency of fire and the availability of combustibles may actually increase.

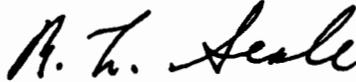
There is not now a quantitative understanding of risks posed by permanently shutdown nuclear plants. In the absence of detailed risk information, the staff has elected to formulate performance-based recommendations to licensees for satisfying the regulatory requirements for appropriate fire protection programs. The proposed Regulatory Guide endorses approximately 30 industry fire protection standards. The staff believes that implementation of these industry standards coupled with the performance of a fire hazard analysis meeting minimal requirements will ensure that the level of fire risk at permanently shutdown nuclear plants will be at or below the level of fire risk existing at operating plants. Demonstration of the equivalence of protection is apparently beyond the current state-of-the-art.

Industry standards specified in the Regulatory Guide provide explicit guidance concerning many features of fire protection programs. The Regulatory Guide is less explicit with respect to the fire hazard analysis that will be acceptable to the staff. We believe that the staff should more definitively describe its expectations for a fire hazard analysis, especially for permanently shutdown nuclear plants co-located with existing reactors and shutdown reactors with fuel still present in the spent fuel pool. This should not delay issuance of the Regulatory Guide for public comment.

The risk of fires at permanently shutdown nuclear plants will vary with time. The staff expects that licensees will be able to use the process specified in 10 CFR 50.59 to change fire protection programs as vulnerabilities decrease. The staff should ensure that any revisions to 10 CFR 50.59 or associated regulatory guides would continue to allow the licensees to modify fire protection programs.

We have no objection to the issuance of the Draft Regulatory Guide DG-1069 for public comment, and would like to have an opportunity to review the proposed final Regulatory Guide after reconciliation of public comments.

Sincerely,



R. L. Seale
Chairman

Reference:

U. S. Nuclear Regulatory Commission, Office of Nuclear Regulatory Research, Draft Regulatory Guide, DG-1069, Fire Protection Program for Permanently Shutdown and Decommissioning Nuclear Power Plants, June 1997.