

A stylized graphic of an atomic symbol, featuring a light blue nucleus and three elliptical orbits in shades of blue, positioned on the left side of the slide.

Public Meeting on NFPA 805 Guidance Documents

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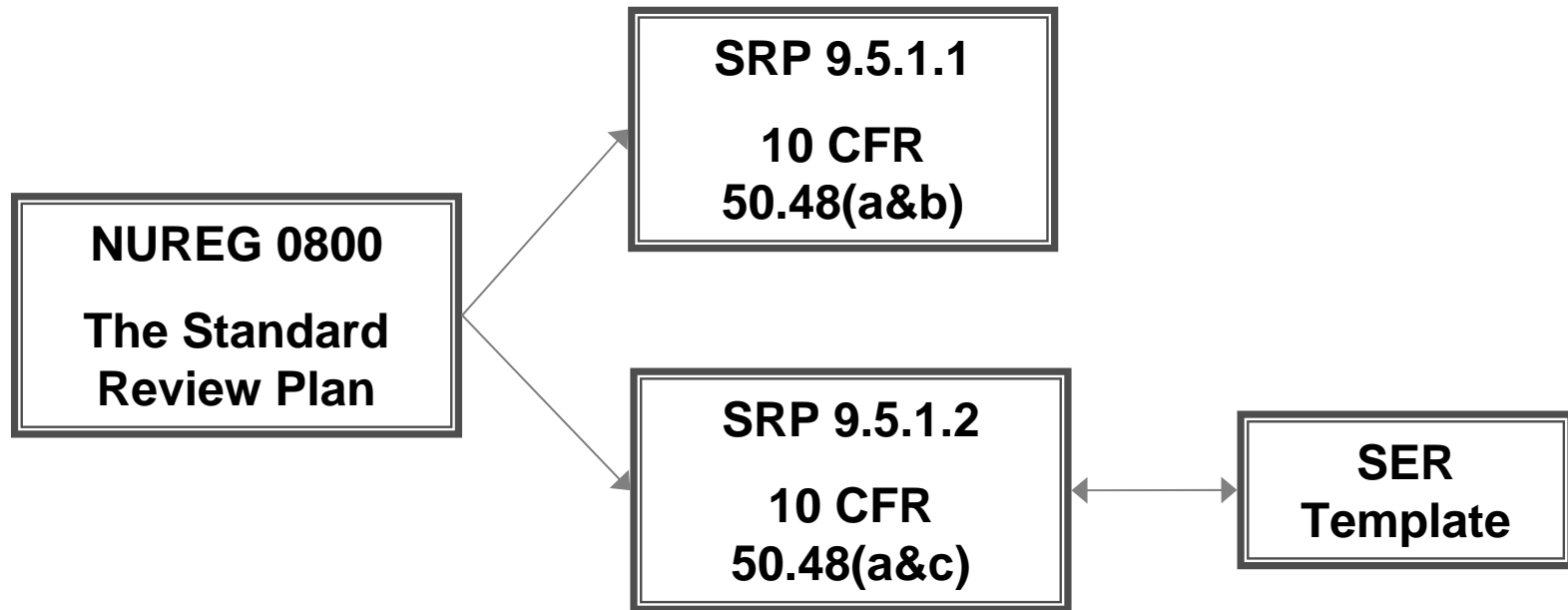
Overview of the NFPA 805 Guidance

April 29, 2009

Drivers for Guidance Revisions

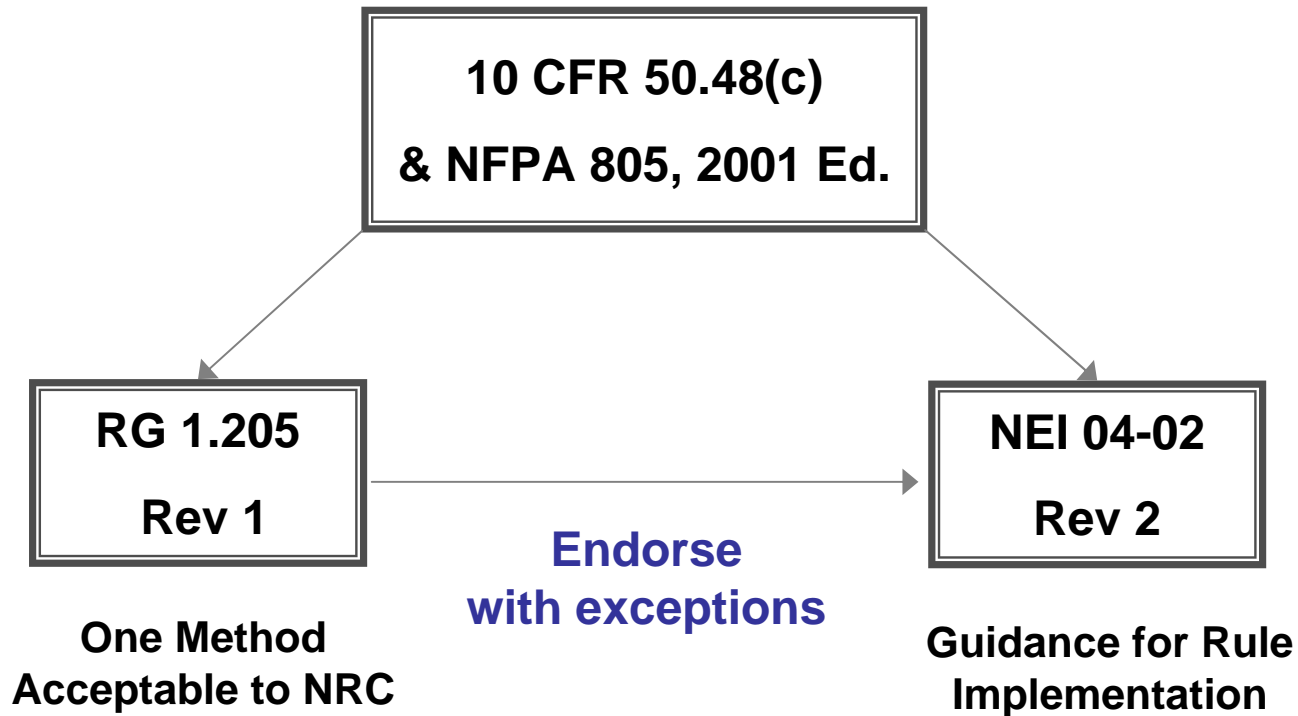
- Lessons learned from review of pilot plant LAR submittals
- Staff reviews of pilot plant PRAs
- FAQ process of resolving technical issues
- Revision 2 to NEI 04-02

Standard Review Plan Framework



SRP 9.5.1.2: “Risk-informed, Performance-based Fire Protection Program”

RG 1.205 Revision 1 Framework



DG-1218: “Risk-informed, Performance-based Fire Protection Program for Existing Light-water Nuclear Power Plants”

Improved Clarity and Regulatory Stability

Key Guidance Document Revisions:

- New exceptions/clarifications to NEI 04-02 Rev 2 endorsement
- Guidance on self approval of changes
 - License condition
 - PRA methods for applications
- Guidance on transitioning recovery actions
 - Definition of primary control station
- Guidance on transitioning forward existing exemptions

Schedule

- Out for public comment
 - SRP: February 5, 2009
 - RG: March 25, 2009
- Comments requested by:
 - SRP & RG: May 22, 2009
- ACRS Briefings in June, July and September of 2009
- Estimate final SRP and RG by 12/2009



End of Overview Presentation

Selected Exceptions/Clarifications to NEI 04-02 Revision 2

- Licensees should follow the words of 10 CFR 50.48(c), which incorporates by reference the text of NFPA 805, 2001 Edition, if there are conflicts with NEI 04-02.
- NRC does not endorse using the performance-based methods of NFPA 805 to support changes to their current, pre-transition licensing bases.
- Licensees should verify that portions of the existing FPP that are to be “transitioned” do in fact comply with the requirements of NFPA 805.
- All recovery actions must be addressed using performance-based methods
- Combined changes require prior NRC review and approval if any part of those changes would fail to meet the risk acceptance criteria
- NRC does not endorse the fire model V&V standard referenced in NEI 04-02. NRC used the ASTM E1355-05a, 2005

Recovery Actions and Prior Approval

Appendix R

- III.G.2 verbatim compliance →
- III.G.2 exemption - no OMA →
- III.G.2 exemption - with OMA →
- III.G.3 CR abandonment →

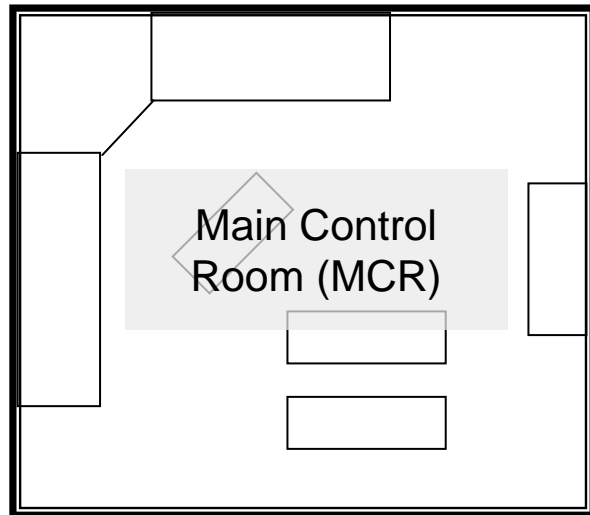
NFPA 805

- Meets 4.2.3
- Meets 4.2.3 if still valid
- Do 4.2.4 risk assessment, but is not a FPP change
- Decision to abandon the CR is a recovery action

Do 4.2.4 risk assessment, but is not a FPP change if previously approved

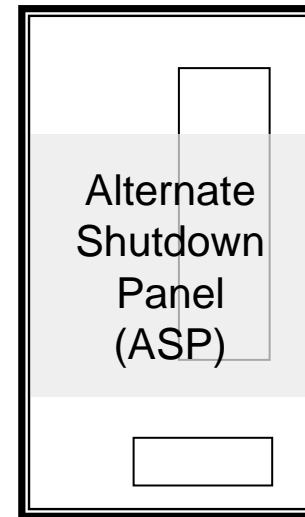
** 4.2.3.1 “Use of recovery actions to demonstrate availability of a success path for the nuclear safety performance criteria automatically shall imply use of the performance-based approach as outlined in 4.2.4.”*

Primary Control Station



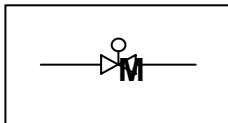
ABANDON

"Recovery Action"
(RA) to abandon
MCR



RECOVERY

Local Operation



ASP actions are not RAs provided that:

- Primary command & control
- Requisite controls, indications, & communications
- Multiple components controlled from location

RG 1.205 Self-Approval Risk Informed

April 2006 Version		Proposed Rev. 1	
ΔCDF			$\Delta LERF$
$10^{-6}/\text{yr}$	<p>Submit summary description of change to the NRC (risk, defense-in-depth, safety margins)</p> <p>Unless NRC objects within 90 days, implement change</p>	<p>Prior NRC review and approval is required</p>	$10^{-7}/\text{yr}$
$10^{-7}/\text{yr}$	<p>Prior NRC review and approval is not required</p> <p>Maintain defense-in-depth and safety margins</p>	<p>Same. Low risk acceptance criteria provides reasonable assurance that cumulative risk is acceptable.</p>	$10^{-8}/\text{yr}$

RG 1.205 Self-Approval Performance Based

April 2006 Version

Proposed Rev. 1

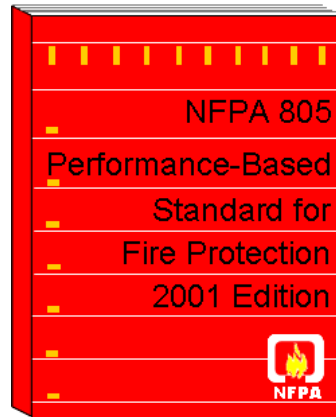
Not addressed

Provision in Sample License
Condition for self-approval per
FAQ 06-008

PRA Methods for Applications DG-1218 Sample License Condition

- The risk assessment approach, methods, and data shall:
 - be appropriate for the nature and scope of the change being evaluated
 - be based on the as-built, as-operated, and maintained plant
 - reflect the operating experience at the plant.
- The risk assessment of the **change** will use methods **previously approved** by the NRC.
- Previously approved methods may include:
 - plant-specific NRC approval through a license amendment
 - NRC approval of generic methods:
 - specifically for use in NFPA 805 risk assessments
 - NRC's generic approval clearly states that the method may be applied without a plant-specific license amendment being granted

NFPA 805 §2.4.3.3



"The PSA approach, methods, and data shall be acceptable to the AHJ. They shall be appropriate for the nature and scope of the change being evaluated, be based on the as-built and as-operated and maintained plant, and reflect the operating experience at the plant."