

May 8, 2009

MEMORANDUM TO: Mark A. Cunningham, Director  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Margaret Stambaugh, Engineer */RA/*  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: APRIL 29, 2009, PUBLIC MEETING SUMMARY – NATIONAL FIRE  
PROTECTION ASSOCIATION STANDARD 805: DRAFT GUIDANCE  
DOCUMENTS

On April 29, 2009, U.S. Nuclear Regulatory Commission (NRC) staff held a Category II public meeting at the Doubletree Bethesda Hotel in Maryland. The purpose of the meeting was to discuss two draft guidance documents which are available for public comment until May 22, 2009. The two draft guidance documents relate to the transition of nuclear power plant licenses to a risk-informed, performance-based fire protection program as described in Title 10, Section 50.48(c), of the *Code of Federal Regulations* and the associated National Fire Protection Association Standard 805, 2001 Edition (NFPA 805). The meeting was announced on April 7, 2009, and the announcement can be found in the Agency-wide Documents Access and Management System (ADAMS), Accession Number ML090970071.

The first draft guidance document is the proposed Standard Review Plan (SRP) Section 9.5.1.2 "Risk-Informed, Performance-Based Fire Protection," which is available in ADAMS under ML090050052. The second draft guidance document is a proposed first revision to Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," which is also in ADAMS under ML090420462. The draft regulatory guide is indexed as DG-1218, and will be referred to as such hereafter in this meeting summary.

The NRC staff stated that the objectives of the meeting were to discuss key aspects of the two draft documents, foster understanding of various points of view on key issues, and encourage written industry and public comments by May 22, 2009. The NRC staff presented several key proposed updates to the guidance as well as a set of discussion topics in specific technical areas. The meeting handouts are available in ADAMS under ML091200033 and a list of attendees is provided as Enclosure 1. The key discussion areas were as follows:

CONTACT: Margaret E. Stambaugh, NRR/DRA  
(301) 415-7069

- DG-1218 endorses NEI 04-02, Revision 2, “Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c),” with certain exceptions and clarifications. At the meeting, participants discussed several of the exceptions and clarifications. For instance, DG-1218 does not endorse the standard referenced in NEI 04-02 for fire modeling verification and validation (V&V). Meeting participants queried the basis for that exception. Since both RG 1.205 and NEI 04-02 require periodic updates as the transition process matures, meeting participants discussed scheduling and resource planning for guidance document updates.
- The draft guide proposes guidance for the performance-based treatment of recovery actions and the calculations necessary to demonstrate compliance with the rule. Discussions in this area focused on how such risk assessments would be used in NRC’s safety determination process. Discussions also took place regarding the process by which previously approved exemptions to Appendix R that involve operator actions should be brought into a NFPA 805 licensing basis. Furthermore, participants discussed the issue of how to address existing fire protection compliance based on Appendix R III.G.3 approved actions.
- DG-1218 proposes guidance for determining the extent to which PRA methods need to be described in a license amendment request. Both a base PRA and the process for future self-approval of changes to a plant’s fire protection program involve “PRA methods.” Discussions focused on distinguishing between those methods involved in developing the base PRA from those used to properly apply the base PRA to a particular plant change.
- Participants discussed the proposed license condition language in DG-1218 which allows a licensee to self-approve plant changes for which a risk assessment indicates that the plant change is of a very small risk increase. The discussion indicated that self-approval is complicated by the postulation of cause/effect relationships that are not part of a plant’s current PRA or by the postulation of novel technologies for which there is no consensus position.
- Participants commented on the importance of improving regulatory stability and decreasing burden for both NRC and licensees that transition to the NFPA 805 licensing basis.

The NRC staff made it clear at several points during the meeting that comments on the draft guidance documents should be provided in writing in accordance with the instructions in the Federal Register notices for the documents and that the statements made by NRC staff do not represent final agency positions.

Enclosure:  
List of Attendees

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**ADAMS ACCESSION NUMBER: ML091210401**

NRC-001

<b>OFFICE</b>	NRR/DRA/APLA	NRR/DRA	NRR/DRA/APLA	NRR/DRA/AFP
<b>NAME</b>	MStambaugh	SLaur	DHarrison	AKlein
<b>DATE</b>	05/01/09	05/04/09	05/05/09	05/08/09

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## LIST OF ATTENDEES

### PUBLIC MEETING TO DISCUSS DRAFT GUIDANCE DOCUMENTS AND FREQUENTLY ASKED QUESTIONS PROCESS

Wednesday April 29, 2009  
Bethesda, MD

#### Industry and Public Attendees

Paul Amico	SAIC
Paul B. Boulden	Appendix R Solutions, Inc.
John Butler	Nuclear Energy Institute
Fleur de Peralta	Tri-En Corporation
Ray Dyer	Nebraska Public Power District
Jeff Ertman	Progress Energy
Michael Fletcher	Ameren
David Goforth	Duke Energy
Greg Harris	Ameren
Ken Heffner	Progress Energy
Alan Holder	Progress Energy
Steven Hutchins	Nuclear Energy Institute
Tom Jutras	Engineering Planning and Management, Inc.
Michael Kammer	South Carolina Electricity and Gas Company
Elizabeth Kleinsorg	Kleinsorg Group
Francy Mantine	First Energy Corporation
Paul Ouellette	Engineering Planning and Management, Inc.
Chris Pragman	Exelon Nuclear
Andy Ratchford	Kleinsorg Group
Vincent Rubano	Florida Power and Light
Thomas Shudak	Omaha Public Power District
Brenda Simril	Tennessee Valley Authority
Sheldon Strubatch	The Regulatory Strategy Group
Jim Szivos	Constellation Energy
Doug True	ERIN Engineerign and Research, Inc.
Neal Tyler	Constellation Energy
Jessica Walker	Entergy
Larry Young	Entergy Operations, Inc
Kiang Zee	ERIN Engineerign and Research, Inc.

#### NRC Attendees

Harold Barrett  
Stephen Dinsmore  
JS Hyslop  
Alex Klein  
Jessica Kratchman  
Paul Lain  
Steven A. Laur  
Charles Moulton  
Margaret Stambaugh  
Marlayna Vaaler  
John A. Vera

Enclosure