

May 5, 2009

MEMORANDUM TO: AFPB File

FROM: Alexander R. Klein, Chief */RA/*
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: CLOSE-OUT OF NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805 FREQUENTLY ASKED QUESTION 06-0022
ELECTRICAL CABLE FLAME PROPAGATION TESTS

The U.S. Nuclear Regulatory Commission (NRC) staff (the staff) has reviewed Frequently Asked Question (FAQ) 06-0022, Revision 3. FAQ 06-0022, Revision 3 was proposed by the transition team at the Arkansas Nuclear One nuclear plant (the authors) to provide guidance on electrical cable flame propagation tests.

Background

Section 3.3.5.3 of National Fire Protection Association Standard 805, 2001 Edition (NFPA805) requires that electrical cables comply with flame propagation tests acceptable to Authority Having Jurisdiction, which is the NRC for US nuclear plants. The initial industry proposal (as seen in FAQ 06-0022, Revision 0) requested approval of a list of cable flame tests. The NRC's Office of Nuclear Regulatory Research (RES) created a report evaluating the existing electrical cable flame tests as part of the collaborative effort to resolve this FAQ. The report was attached to the NRC's comments on Revision 0 of the FAQ.

Development of Revisions 1, 2, and 3 of the FAQ involved the authors and the staff determining how much of the RES report to include in the FAQ, the extent of the proposed addition to NEI 04-02, and the location of the added section in that document.

Industry Proposal

The authors of FAQ 06-0022, Revision 3 proposed guidance to be included in the industry document developed to provide guidance to perform the NFPA 805 transition process, Nuclear Energy Institute document NEI 04-02, "Guidance for Implementing a Performance-Based, Risk-Informed Fire Protection Program Under *10 CFR 50.48(c)*" (NEI 04-02). The proposal would add a new section "NFPA 805 Section 3.3.5.3 (FAQ 06-0022)" to Appendix K of NEI 04-02.

The intent of the proposed section was to incorporate the content of the RES report evaluating the current cable flame propagation tests into NEI 04-02.

CONTACT: Charles E. Moulton, DRA/NRR
(301) 415-2751

NRC Staff Evaluation

The staff has evaluated the FAQ 06-0022, Revision 3 proposals with respect to regulatory compliance and technical adequacy.

The staff found that the authors successfully incorporated the content of the RES evaluation of the cable flame tests.

The staff has reviewed the proposed changes to NEI 04-02 as presented in FAQ 06-0022, Revision 3 and finds that nothing in this FAQ would prevent continued endorsement of NEI 04-02. In accordance with RIS 2007-19, the guidance in this FAQ is acceptable for use by licensees in transition. The final endorsement of this FAQ will be addressed by the next revision to Regulatory Guide 1.205.

References

For details regarding this FAQ, please see the following:

- FAQ 06-0022, Revision 0 (ADAMS accession number ML070030459)
- NRC Staff Response to FAQ 06-0022, Revision 0 (ADAMS accession number ML072050222)
- FAQ 06-0022, Revision 1 (ADAMS accession number ML072340055)
- NRC Staff Response to FAQ 06-0022, Revision 1 (ADAMS accession number ML072740236)
- FAQ 06-0022, Revision 2 (ADAMS accession number ML083010053)
- FAQ 06-0022, Revision 3 (ADAMS accession number ML090830220)
- NEI 04-02, Revision 1 (ADAMS accession number ML052590476)
- NFPA 805, 2001 Edition (available through the Public Document Room or NFPA)
- Regulatory Guide 1.205 (ADAMS accession number ML061100174)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession number ML061660105)
- RIS 2007-19 (ADAMS accession number ML071590227)

NRC Staff Evaluation

The staff has evaluated the FAQ 06-0022, Revision 3 proposals with respect to regulatory compliance and technical adequacy.

The staff found that the authors successfully incorporated the content of the RES evaluation of the cable flame tests.

The staff has reviewed the proposed changes to NEI 04-02 as presented in FAQ 06-0022, Revision 3 and finds that nothing in this FAQ would prevent continued endorsement of NEI 04-02. In accordance with RIS 2007-19, the guidance in this FAQ is acceptable for use by licensees in transition. The final endorsement of this FAQ will be addressed by the next revision to Regulatory Guide 1.205.

References

For details regarding this FAQ, please see the following:

- FAQ 06-0022, Revision 0 (ADAMS accession number ML070030459)
- NRC Staff Response to FAQ 06-0022, Revision 0 (ADAMS accession number ML072050222)
- FAQ 06-0022, Revision 1 (ADAMS accession number ML072340055)
- NRC Staff Response to FAQ 06-0022, Revision 1 (ADAMS accession number ML072740236)
- FAQ 06-0022, Revision 2 (ADAMS accession number ML083010053)
- FAQ 06-0022, Revision 3 (ADAMS accession number ML090830220)
- NEI 04-02, Revision 1 (ADAMS accession number ML052590476)
- NFPA 805, 2001 Edition (available through the Public Document Room or NFPA)
- Regulatory Guide 1.205 (ADAMS accession number ML061100174)
- NFPA 805 FAQ Process Document, Revision 1 (ADAMS accession number ML061660105)
- RIS 2007-19 (ADAMS accession number ML071590227)

DISTRIBUTION:

DRA R/F AKlein HBarrett PLain CMoulton

ADAMS Accession Number: ML091240278 NRR-106

OFFICE	NRR/DRA/AFPB	NRR/DRA/AFPB	NRR/DRA/AFPB
NAME	CMoulton	HBarrett	AKlein
DATE	05/ 04 /09	05/ 04 /09	05/ 05 /09

OFFICIAL RECORD COPY