

January 15, 2010

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 07-0039
INCORPORATION OF PILOT PLANT LESSONS LEARNED – TABLE B-2

The Nuclear Regulatory Commission (NRC) staff has reviewed National Fire Protection (NFPA) Standard 805 Frequently Asked Question (FAQ) 07-0039, Revision 2. FAQ 07-0039, Revision 2 was proposed by the transition team at the Shearon Harris nuclear plant (the authors) to provide additional guidance on the suggested methodology for transition of the Nuclear Safety Performance Criteria by a licensee.

Industry Proposal

The authors of FAQ 07-0039, Revision 2 proposed guidance to be included in the industry document developed to provide guidance to perform the NFPA 805 transition process, Nuclear Energy Institute (NEI) 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 modifies sections 4.3.2 and B.2 of that document.

The proposal provides additional details for the suggested methodology for transition of the Nuclear Safety Performance Criteria currently contained in NEI 04-02, as well as a new flowchart of the process. The methodology is based on a comparison of the licensee's safe shutdown strategy to industry guidance document NEI 00-01 "Guidance for Post-Fire Safe Shutdown Circuit Analysis," Revision 1 (NEI 00-01). In short, the process requires licensees to assemble industry and plant-specific documentation, determine which sections of NEI 00-01 are applicable to the licensee, compare the plant-specific safe shutdown methodology to the applicable sections of NEI 00-01, and document any discrepancies.

NRC Staff Evaluation

The staff has reviewed the proposed changes to NEI 04-02 as presented in FAQ 07-0039, Revision 2 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.

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References

For details regarding this FAQ, please see the following:

FAQ 07-0039, Revision 0 (ADAMS accession number ML072740268)
NRC Staff Response to FAQ 07-0039, Revision 0 (ADAMS accession number ML073330556)
FAQ 07-0039, Revision 1 (ADAMS accession number ML080910136)
FAQ 07-0039, Revision 2 (ADAMS accession number ML091420138)
NEI 04-02, Revision 1 (ADAMS accession number ML052590476)
NEI 00-01, Revision 1 (ADAMS accession number ML050310295)
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)

References

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- FAQ 07-0039, Revision 0 (ADAMS accession number ML072740268)
- NRC Staff Response to FAQ 07-0039, Revision 0 (ADAMS accession number ML073330556)
- FAQ 07-0039, Revision 1 (ADAMS accession number ML080910136)
- FAQ 07-0039, Revision 2 (ADAMS accession number ML091420138)
- NEI 04-02, Revision 1 (ADAMS accession number ML052590476)
- NEI 00-01, Revision 1 (ADAMS accession number ML050310295)
- 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)

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ADAMS Accession Number: ML091320068 NRR-106

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