

Southern Nuclear
Operating Company, Inc.
40 Inverness Center Parkway
Birmingham, Alabama 35242

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U.S. Nuclear Regulatory Commission
Office of Administration
Washington, DC 20555-0001

Attention: Rulemaking, Directives, and Editing Branch

Southern Nuclear Operating Company
Comments on Draft Regulatory Guide DG-1218
"Risk-Informed, Performance-Based Fire Protection For
Existing Light-Water Nuclear Power Plants"

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RULES AND DIRECTIVES
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Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Joseph M. Farley Nuclear Plant, the Edwin I. Hatch Nuclear Plant and the Vogtle Electric Generating Plant, has reviewed Draft Regulatory Guide DG-1218, entitled "Risk-Informed, Performance-Based Fire Protection For Existing Light-Water Nuclear Power Plants" (which is proposed Revision 1 to Regulatory Guide 1.205, dated April 2006). The nuclear industry, through Nuclear Energy Institute (NEI), is currently working on a comprehensive comment document for the technical comments on DG-1218. Therefore, our review comments are specifically oriented towards applicability of this draft regulatory guide to new nuclear plants only.

The proposed revision to Regulatory Guide 1.205 specifically endorses by reference the latest edition of NEI 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)," (Revision 2) as an acceptable guidance document for NFPA 805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants" transition. Overall, both DG-1218 and NEI 04-02 address transitioning existing nuclear plant fire protection programs to NFPA 805. However, neither DG-1218 nor NEI 04-02 address fire protection program requirements for new nuclear plants. Thus, either Regulatory Guide 1.205 or NEI 04-02 needs to be revised to accommodate new nuclear plants or new guidance documents need to be developed in order to adopt a risk-informed licensing basis should a risk-informed/performance based fire protection licensing bases either be required for new reactors or licensees choose to adopt one in lieu of deterministic fire protection licensing bases.

SUNSI Review Complete
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Add = R. Jervey (RAJ);
S. LAUR (SAL)
M. Stambaugh (MXS15)

Sincerely,

A handwritten signature in black ink that reads "Charles R. Pierce". The signature is written in a cursive style with a large initial "C".

Charles R. Pierce
Nuclear Development Licensing Manager

CRP/BJS/dmw

cc: M. K. Smith, Technical Support Director
M. J. Ajluni, Nuclear Licensing Manager
J. D. Lattner, Fire Protection Supervisor
B. W. Waites, Senior Engineer
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