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FPL

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Rulemaking, Directives and Editing Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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RULES AND DIRECTIVES BRANCH

Re: Comments on Draft Regulatory Guide DG-1214,
Fire Protection for Nuclear Power Plants

Florida Power & Light Company and NextEra Energy hereby submit the following comments on Draft Regulatory Guide DG-1214, "Fire Protection for Nuclear Power Plants." FPL and NextEra Energy also endorse the comments transmitted by the Nuclear Energy Institute (NEI).

The following comments compliment NEI's response:

1. Section 5.3.1, 1st paragraph - Request that the Regulatory Guide (RG) section be revised to acknowledge that Appendix H of industry guidance document NEI 00-01, "Guidance for Post-Fire Safe-Shutdown Circuit Analysis," (Reference 25 in DG-1214) provides an acceptable methodology for classification of equipment for post-fire safe-shutdown circuits. Also, clarify that "a success path of systems necessary to achieve and maintain hot-shutdown conditions" is the same as "required for hot shutdown" components in Appendix H.

2. Section 5.3.1, 2nd paragraph - The 4th sentence indicates that cable fire testing performed by the industry has demonstrated that multiple spurious actuations occurring in rapid succession (without sufficient time to mitigate the consequences) may have a relatively high probability, based on multiple factors, including cable insulation or jacketing materials and cable configurations. While the tests indicate that multiple spurious actuations may occur the evidence was far from conclusive that there was a relatively high probability of occurrence in actual field installation and circuits. Request that "relatively high probability" be deleted.

3. Section 5.3.1, 2nd paragraph - Request that the RG section be revised to acknowledge that Chapter 4 and Appendix G of industry guidance document NEI 00-01 provides an acceptable methodology for addressing multiple spurious actuations.

4. Section 5.3.1.1, 1st paragraph - Request that the RG section be revised to acknowledge that Appendix H of industry guidance document NEI 00-01 provides an acceptable methodology for classification of equipment for post-fire safe-shutdown circuits. Also, clarify that "a success path of systems necessary to achieve and maintain hot-shutdown conditions" is the same as "required for hot shutdown" components in Appendix H.

5. Section 5.3.1.2 - Request that the RG section be revised to acknowledge that Appendix H of industry guidance document NEI 00-01 provides an acceptable methodology for classification of equipment for post-fire safe-shutdown circuits.

SUNSI Review Complete
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E-RIDS = ADM-03
Add = R. Jervey (RAJ)

6. Section 5.3.1.3 - Request that the RG section be revised to acknowledge that Appendix E of industry guidance document NEI 00-01 provides an acceptable methodology for addressing operator manual actions.

7. Section 5.3.1.5 - Request that the RG section be revised to acknowledge that Appendix H of industry guidance document NEI 00-01 provides an acceptable methodology for classification of equipment for post-fire safe-shutdown circuits.

8. Glossary - Request that the RG glossary for "success path" be revised to acknowledge that this classification is the same as the NEI 00-01 Appendix H classification of required for hot shutdown.

9. Glossary - Request that the RG glossary be revised to add a definition for "important to safe-shutdown" as discussed in RG Section 5.3.1.

10. References - Update Reference 25, NEI 00-01, to reflect a later revision assuming the NEI issues a later revision before the revised RG is approved.

11. Many of the above comments request endorsement of industry document NEI 00-01 which is currently in the process of being revised. If this endorsement is not provided, then the nuclear plants which are not transitioning to NFPA 805 will not have sufficient detailed technical guidance to reach resolution of the fire induced multiple spurious actuations issue.

Please contact Mr. Bob Hughes at (561) 691-7134 if there are questions concerning these comments.

Sincerely yours,

Robert J. Hughes
Director, Licensing and Performance Improvement