

From: HUTCHINS, Steven [sph@nei.org]
Sent: Friday, August 28, 2009 9:16 AM
To: Moulton, Charles; Lain, Paul; Barrett, Harold
Cc: Klein, Alex; Weerakkody, Sunil
Subject: RE: FAQ 0050 - NRC Final Draft Position for Urgent Review

Chuck. Here is the email on FAQ 50. Basically, while significant improvement is needed, approval of FAQ 50 "as is" turns out to be better than nothing. The Task Force reserves the right to continue discussion on this subject until major mistakes are corrected.

Since we have not been asked to comment on FAQ 48, we are not sure how to comment. (comment incorporation appeared in ADAMS, but we have not seen the closure letter)

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From: HUTCHINS, Steven
Sent: Thursday, August 27, 2009 2:34 PM
To: 'Charles.Moulton@nrc.gov'; 'Paul.Lain@nrc.gov'; 'Harold.Barrett@nrc.gov'
Cc: 'Alex.Klein@nrc.gov'; 'Weerakkody, Sunil'
Subject: FAQ 0050 - NRC Final Draft Position for Urgent Review

Here are the comments I have received from the NFPA 805 Task Force for FAQ 50

1. The ADAMS acquisition number (ML092180383) referenced in the two memos appears to be incorrect. I found the response to comments for FAQ 08-0050 under ML092180533.
2. The smoldering fire analysis is still absent. The reason (see attached) is because smoldering fires are all challenging fires and therefore must be retained in the fire PRA.

Not sure if a redefining of challenging is appropriate at this point, but clearly smoldering fires are contributing to conservatism. Specifically;

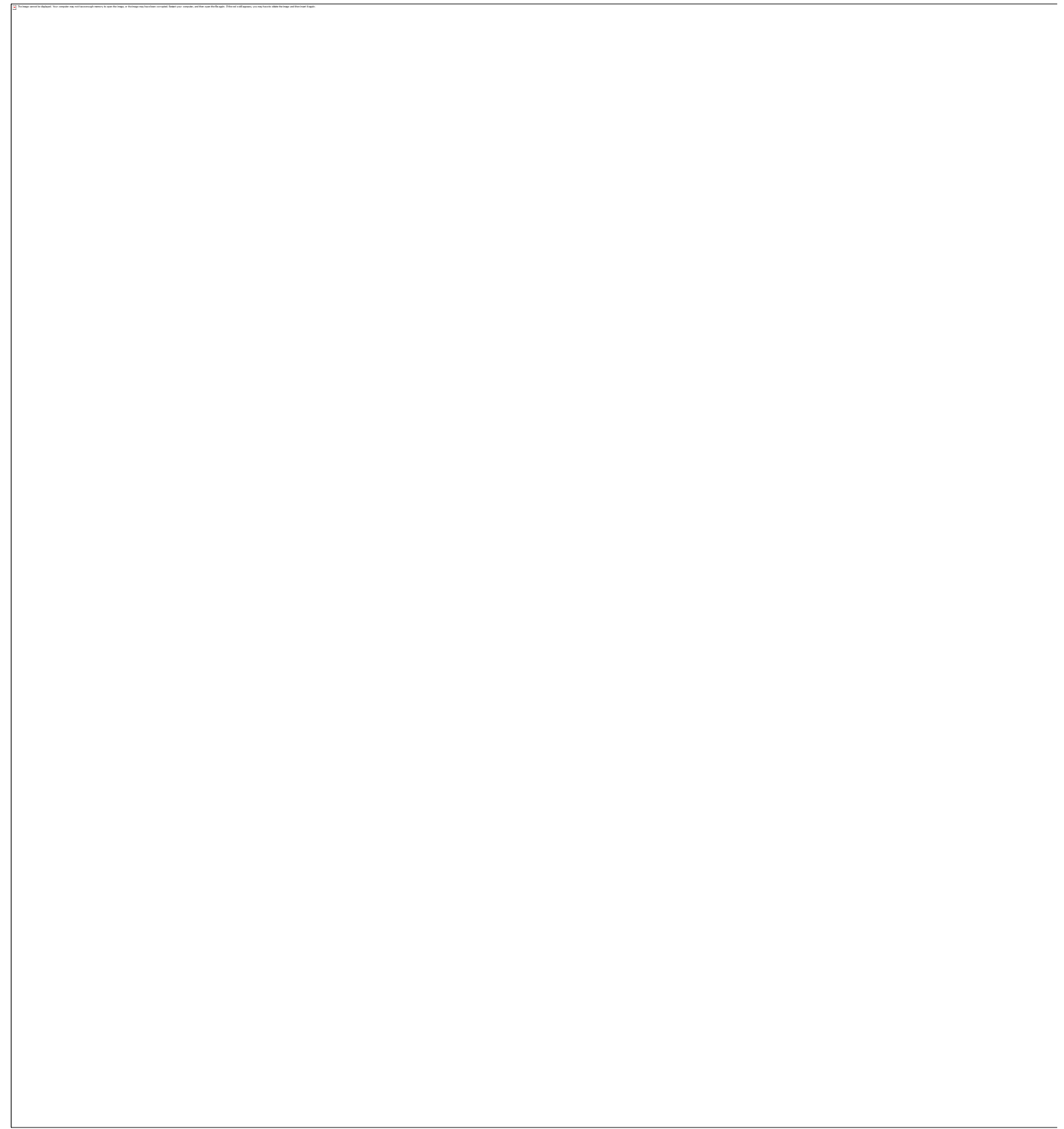
Again we can point out that the NRC continues to instill conservatism in the Fire PRA methods. They suggest the "smoldering" events should not be removed from the DB, since they were fires. We are suggesting retaining the events as challenging or unknown (if they weren't controlled, they could have caused more damage), but we continue to support removing them from the non-suppression curves. In the end, whether we call them smoldering fires or something else, the events if modeled in the PRA would have burnt down the turbine building or burnt out the room where the fire occurred. In fact, since the fire brigade controlled the fires, no damage what-so-ever occurred. So we either need to insert a "control" time in the non-suppression curve, to show that the fires did not cause damage, or remove them from the non-suppression curves.

Just look at any of the events in the table. For example, even 668 with a 217 minute T/G fire, where only glowing embers were reported. I would imagine if we modeled a 217 minute T/G fire, not only would the Turbine Building be burnt down, the 3 hour fire wall between the TB and other buildings would have been failed. We end up applying this 217 fire to the non-suppression curve, and the tail of the T/G curve ends up a factor of 4 higher for greater than 180 minute fires. In the PRA, we model that any T/G fire could have lasted that long, which is not correct. See Figure 4 below. The effects on electrical and oil fires is much smaller than T/G and only have a few percent difference.

Unless we are going to significantly change the model to something like multiple growth rates, different non-suppression curves for each HRR or fire type, or something else, we need to find a way to include these events but have the impact of the events correctly applied to the factors we develop in 6850.

We should continue to stress that whatever factors we develop, including the non-suppression curves, these should be developed in order to have our PRAs model what really happens in the plant. Judgment should be used instead of conservatism. In this case, we would like to develop non-suppression curves that represent reality, and these events are just a start to than effort.

3. The duplicate events (1482 & 1483) referenced under the basis for industry average response on page 5 are incorrect. The correct duplicates are 495 & 914 per ERIN's original analysis. (Note that the data behind the curves may be impacted by this correction.)



From: Weerakkody, Sunil [mailto:Sunil.Weerakkody@nrc.gov]
Sent: Wednesday, August 19, 2009 3:14 PM

To: HUTCHINS, Steven

Cc: Klein, Alex; Harrison, Donnie; Parry, Gareth; Salley, MarkHenry; Hyslop, JS; Alexander, Cheryl; Moulton, Charles; Gallucci, Ray; Siu, Nathan

Subject: A Heads of for your urgent attention

Steve:

Please see the attachment above.

We are in the process of closing out FAQ-50. However, based on an insight that Dr. Parry, our SLS in PRA shared with us, we made a modification to it (highlighted) in YELLOW. Even though we do not believe that the change that we made affects the FAQ position, we want to give you an opportunity to contend our view.

Please share with your counterparts at EPRI etc.

Unless, at the next FAQ meeting (scheduled on next Thursday) task members bring up technically substantiated concerns, we plan to close out FAQ-50 within the next couple of weeks.

(Cheryl: Please add this Email and the attachment to public ADAMS).

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