

October 7, 2009

MEMORANDUM TO: Donnie Harrison, Chief  
PRA Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Margaret Stambaugh /RA/  
PRA Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING HELD SEPTEMBER 10, 2009,  
REGARDING DRAFT REGULATORY GUIDE DG-1218

On September 10, 2009, the U.S. Nuclear Regulatory Commission (NRC) held a Category 3 public meeting to discuss the Draft Guide (DG)-1218, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." This draft guide represents Revision 1 to Regulatory Guide 1.205 (RG 1.205), of the same title. An attendance list is included in this summary as an enclosure. The slides from the meeting are included in the Agencywide Documents Access and Management System (ADAMS) under accession numbers ML092570773 and ML092570786.

#### Summary of Meeting

The purpose of the meeting was to discuss the disposition of public comments made to DG 1218. The NRC staff presented the content of the Draft Final RG 1.205, Revision 1 and provided the guide as a handout (ML092450118). The discussion focused on three technical topics: the definition of "primary control station," the additional risk of recovery actions, and fire probabilistic risk analysis (PRA) models. The meeting notice can be found under ADAMS accession number ML092450403.

An industry stakeholder made an observation that the new content in the RG related to technical adequacy of the fire PRA, engineering equivalency evaluations and the definition of "primary control station" constitutes an improvement in the guidance.

Another industry stakeholder noted that regulatory stability would be improved if the RG is issued after a license amendment request template is established and if the extent to which the RG endorses NEI 04-02 is clear. Also, an industry stakeholder expressed the opinion that Chapter 10 of the *Code of Federal Regulations*, Section 50.48(c), does not require that a licensee address the risk presented by the use of recovery actions using National Fire Protection Association Standard 805, Sections 4.2.4.1 or 4.2.4.1.

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D. Harrison

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Members of the general public did not have any questions or comments during the meeting.

No conclusions were made regarding these technical topics that were discussed. The NRC staff plans to present the Draft Final RG 1.205, Revision 1, to the Advisory Committee for Reactor Safety in November, 2009.

Enclosure:  
As stated

Members of the general public did not have any questions or comments during the meeting.

No conclusions were made regarding these technical topics that were discussed. The NRC staff plans to present the Draft Final RG 1.205, Revision 1, to the Advisory Committee for Reactor Safety in November, 2009.

Enclosure:  
As stated

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| MStambaugh  | RNease      | SLaur     |                |
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| OFFICE: | NRR/DRA/APLA | NRR/DRA/APLA |
| NAME:   | MStambaugh   | DHarrison    |
| DATE:   | 10/ 07 /09   | 10/ 07 /09   |

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**Meeting on Draft Guide 1218  
September 10, 2009  
List of Participants**

**NRC STAFF**

Harold Barrett  
Mark Cunningham  
Stephen Dinsmore  
Donnie Harrison  
Alex Klein  
Paul Lain  
Steven A. Laur  
Norman Merriweather\* (Region II)  
Ken Miller\* (Region II)  
Charles Moulton  
Margaret Stambaugh  
LaDonna Suggs\* (Region II)  
Marlayna Vaaler  
Sunil Weerakkody

**OTHER**

|                     |                                     |
|---------------------|-------------------------------------|
| John Butler         | Nuclear Energy Institute            |
| Fleur dePeralta     | Tri-En Corporation                  |
| David Goforth       | Duke Energy                         |
| Steven Hutchins     | Nuclear Energy Institute            |
| Vincent Rubano      | Florida Power and Light             |
| Andy Ratchford      | Kleinsorg Group                     |
| Elizabeth Kleinsorg | Kleinsorg Group                     |
| Jeff Ertman         | Progress Energy                     |
| Ed Simbles          | Erin Engineering                    |
| Robert Kalantari*   | Engineering Planning and Management |
| Michael Fletcher*   | Ameren                              |
| Michael Richardson* | Pacific Gas and Electric            |
| Nancy Chapman*      | Bechtel                             |
| Larry Young*        | Entergy                             |
| Richard Harris*     | Entergy                             |
| Jessica Walker*     | Entergy                             |
| Lori Potts*         | Entergy                             |
| David Miskiewicz*   | Progress Energy                     |

\* participated via phone

ENCLOSURE