

**Response to NRC Staff Comments on FAQ 09-0057, Revision 0 [CEM HTB]**  
{September 2009}

**Page 2:** Note that for each Chapter 3 element, the licensee must: demonstrate compliance (for example, via previous NRC approval, Engineering Equivalency Evaluations, or minor clarifications), make a change to the plant to achieve compliance, or request NRC approval (for example, via “(c)(4)” or “(c)(2)(vii)”).

**Response:** *This clarification has been added to page 2 of the FAQ, after the direct quotes from NEI 04-02.*

**Demonstrating compliance:** It was the staff’s understanding from what was presented at the August 27, 2009 FAQ meeting that compliance would be demonstrated by comparing, in a quantitative calculation, the risk of the alternate shutdown strategy to the NFPA 805 deterministically compliant case (as opposed to comparing it with the current shutdown strategy). If this is the case, the FAQ resolution, which currently describes a qualitative calculation, should be modified to align it with the actual proposal.

**Response:** *The passage (first bullet in boldface) cited by NRC refers to the comparison of the alternate shutdown strategy against the CLB (SISBO). So, in this context the use of a qualitative assessment for this purpose is correct as there will be no PRA for the SISBO case. The quantitative comparison between the alternate shutdown strategy and the deterministically compliant case is the subject of the second bullet in boldface, which does call for quantitative assessment. Changes to the text and the addition of a footnote have been implemented to clarify this.*

**General:** Please perform a general editing QA check.

**Response:** *Text has been reviewed and in a few places clarified. Changes have been made at various locations throughout the document, but the meaning has not been changed. In addition, references to “change evaluation” have been changed to “fire risk evaluation” to be consistent with the current draft of RG 1.205, as this FAQ refers to analyses performed during transition and under the current proposed RG 1.205 change evaluations only occur post-transition.*