

November 6, 2009

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

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

SUBJECT: SUMMARY OF PUBLIC MEETING HELD OCTOBER 29, 2009,
REGARDING DRAFT REGULATORY GUIDE DG-1218

On October 29, 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 ML093100341 and ML093100345.

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 (ML092881133). The NRC staff also provided two other handouts: a redline/strikeout version showing the changes to RG 1.205 since a public meeting held on September 10, 2009 (ML093100347), and the draft final Standard Review Plan Section 9.5.1.2, "Risk-Informed, Performance-Based Fire Protection Program" (ML093100352). The meeting notice can be found under ADAMS accession number ML092881110.

The discussion focused on three technical topics: the definition of "primary control station," the additional risk of recovery actions, and the proposed standard license condition. The NRC staff clarified the staff position with regard to control room abandonment. It is the intent of RG 1.205, Section 2.4, that actions taken in the process of abandoning a control room and transferring to a primary control station may meet the definition of a recovery action, but the additional risk of their use does not need to be evaluated to demonstrate compliance with the National Fire Protection Association (NFPA) 805.

An industry stakeholder made an observation that issuing this revision to the regulatory guide at this time will contribute to the regulatory stability of the NFPA 805 transition process.

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Another industry stakeholder noted that the guidance would be improved with further clarification of the extent to which RG 1.205 Revision 1 endorses Nuclear Energy Institute 04-02 "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)," Revision 2. Also, an industry stakeholder cautioned that the pilot process has not been fully vetted, especially as it relates to fire risk evaluations.

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 on November 13, 2009.

Enclosure:
As stated

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Enclosure:
As stated

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MCunningham	SWeerakkody	DHarrison	
MStambaugh	RNease	SLaur	
PLain	HBarrett	CMoulton	

Meeting Summary Memo

3. Slides presented at the meeting
4. NEI slides presented at the meeting
5. Redline/strikeout version of RG 1.205 (a meeting handout)
6. the draft final SRP 9.5.1.2 (a meeting handout)

ADAMS Package Accession No.:	ML093100442
ADAMS Memo Accession No.:	ML093100330
ADAMS Slides Accession No.:	ML093100341
ADAMS NEI slides Accession No.:	ML093100345
ADAMS Redline strikeout Accession No.:	ML093100347
ADAMS Draft final Accession No.:	ML093100352

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NAME:	MStambaugh	DHarrison	
DATE:	11/ 06 /09	11/ 06 /09	

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**Meeting on Draft Guide 1218
October 29, 2009
List of Participants**

NRC STAFF

Harold Barrett
Stephen Dinsmore
Lauren Gibson*
John Lai
Paul Lain
Steven A. Laur
Charles Moulton
Margaret Stambaugh
LaDonna Suggs* (Region II)
Robert Vettori
Sunil Weerakkody

OTHER

John Butler	Nuclear Energy Institute
David Goforth	Duke Energy
Steven Hutchins	Nuclear Energy Institute
Elizabeth Kleinsorg	Kleinsorg Group
Peter Mazzaferro*	Constellation Energy
David Miskiewicz	Progress Energy
Andy Ratchford	Kleinsorg Group
Vincent Rubano	Florida Power and Light
Jessica Walker*	Entergy
Larry Young*	Entergy

* participated via phone

ENCLOSURE