



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

December 15, 2009

The Honorable Gregory B. Jaczko
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: DRAFT FINAL REGULATORY GUIDE 1.205, REVISION 1, "RISK-INFORMED, PERFORMANCE-BASED FIRE PROTECTION FOR EXISTING LIGHT-WATER NUCLEAR POWER PLANTS," AND DRAFT FINAL STANDARD REVIEW PLAN (SRP) SECTION 9.5.1.2, "RISK-INFORMED, PERFORMANCE-BASED FIRE PROTECTION PROGRAM"

Dear Chairman Jaczko:

During the 568th meeting of the Advisory Committee on Reactor Safeguards, December 3-5, 2009, we completed our review of the Draft Final Regulatory Guide (RG) 1.205, Revision 1, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," and the associated Draft Final Standard Review Plan (SRP) Section 9.5.1.2, "Risk-Informed, Performance-Based Fire Protection Program." Our Reliability and PRA Subcommittee also reviewed this matter during meetings held on June 1, August 18, and November 13, 2009. During these meetings we had the benefit of discussions with representatives of the NRC staff and the industry. We also had the benefit of the documents referenced.

RECOMMENDATION

Regulatory Guide 1.205 and the associated SRP Section 9.5.1.2 should be issued.

DISCUSSION

10 CFR 50.48(c), adopted by the NRC in 2004, incorporates NFPA Standard 805 by reference, with certain exceptions. It allows licensees to adopt and maintain a Fire Protection Plan (FPP) that meets the requirements of NFPA 805 as an alternative to 10 CFR 50.48(b) or the plant-specific fire protection license conditions.

In April 2008, the Nuclear Energy Institute (NEI) issued NEI 04-02, Revision 2, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c)," to assist licensees in adopting 10 CFR 50.48(c) and making the transition from their current FPP to one based on NFPA 805. RG 1.205 endorses portions of NEI 04-02, Revision 2, and includes clarification of the guidance provided in NEI 04-02, as well as NRC exceptions to the guidance.

During our subcommittee meetings we raised questions related to the definitions of recovery actions and primary control station, the use of deterministic vs. probabilistic methods in fire areas, shutdown risk evaluations, and the application of RG 1.174 during the transition period.

The staff was responsive to our comments and made several changes to RG 1.205 to address these questions. The presentations by representatives of the pilot plants, Oconee Nuclear Station (Duke Energy) and Shearon Harris Nuclear Power Plant (Progress Energy), were very informative. Both organizations recommended the issuance of RG 1.205.

RG 1.205 and the associated SRP Section 9.5.1.2 will be useful to licensees and staff in implementing 10 CFR 50.48(c). They should be issued.

Sincerely,

/RA/

Mario V. Bonaca
Chairman

REFERENCES

1. U.S. Nuclear Regulatory Commission: Draft Final Regulatory Guide 1.205, Revision 1 (DG-1218), "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," 09/2009 (ML092510126)
2. U.S. Nuclear Regulatory Commission: Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," 05/2006 (ML061100174)
3. National Fire Protection Association (NFPA): NFPA 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition
4. Nuclear Energy Institute (NEI): NEI 04-02, Rev. 2, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c)," 04/2008 (ML081130188)
5. U.S. Nuclear Regulatory Commission: NUREG-0800, Rev. 0, Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition, Section 9.5.1.2, "Risk-Informed, Performance-Based Fire Protection Program," 01/2009 (ML092590465)
6. U. S. Nuclear Regulatory Commission: Regulatory Guide 1.174, Revision 1, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," 11/2002 (ML023240437)

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Letter to the Honorable Gregory B Jaczko, Chairman, NRC, from Mario V. Bonaca, Chairman, ACRS, dated December 15, 2009

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