



Step 1

Demonstration of the nuclear safety performance criteria occurs in two NSCA analyses:

- Fire Occurs in Modes 1-2 @ POWER ANALYSIS
- Fire Occurs in Transition Mode 3 and below NON-POWER ANALYSIS

Process reflected in this flowchart is for @ Power

Step 2

Engineering Evaluations (including licensing actions) are considered part of the deterministic compliance approach.

Generally variances can be categorized as shown. Separation issues may also be categorized as OMAs and likewise pre-transition OMAs could be characterized as separation issues.

Can decide to credit a modification to bring into deterministic compliance

Step 3

Not all recovery actions require evaluation to the requirements of NFPA 805 § 4.2.4. Only those recovery actions that demonstrate availability of a success path for the NSPC require compliance with § 4.2.4.

Step 4

Using the guidance provided in NEI 04-02 and RG 1.205 Rev 1 perform a fire risk evaluation for VFDRs (does not meet § 4.2.3 )

Fire Risk Evaluation shall meet acceptance criteria of NFPA 805:

Risk (during transition RG 1.174):

- Fire Protection Systems/ Features, Recovery actions may be required (new or existing)
- Modification may be required

DID / SM:

- Fire Protection Systems/ Features, Recovery actions may be required (new or existing)
- Programmatic enhancements

Therefore VFDR resolution may be:

- Accept As Is
- Require FP systems/features Recovery actions (existing)
- Require Recovery Action
- Require Programmatic enhancements
- Require Plant Modification

Note - Recovery Actions shall be feasible

