

LAR Template

December 16, 2009

Agenda

- ◆ LAR Contents
- ◆ Suggested Transition Report Outline
- ◆ For each section of the Transition Report
 - Purpose of Section
 - RAIs
 - Draft RG 1.205
 - Draft SRP 9.5.1.2
 - NEI 04-02 Changes

LAR Contents

- ◆ Cover letter
- ◆ Notarized Affidavit
- ◆ Transition Report
- ◆ Facility Operating License, Technical Specifications, and Technical Specification Bases – Markup
- ◆ Facility Operating License, Technical Specifications, and Technical Specification Bases – Retype
- ◆ Regulatory Commitments

Suggested Transition Report Outline

- ◆ [Suggested Transition Report Template Table of Contents](#)

Section 1 – Introduction

LAR Template

Purpose: Introductory material

1.1 Background

1.1.1 NFPA 805 –
Requirements and
Guidance

1.1.2 Transition to 10 CFR
50.48(c)

1.1.2.1 Start of Transition

1.1.2.2 Transition Process

1.2 Purpose

RAIs/Guidance/Changes

◆ RAIs

- Minor changes

◆ Draft RG 1.205

- No specific reference

◆ Draft SRP 9.5.1.2

- No specific reference

◆ NEI 04-02

- No changes to NEI 04-02
- Include in LAR Template

Section 2 – Overview of FP Program

LAR Template

Purpose: Present current license condition and basis for NRC acceptance

2.0 Overview of Existing Fire Protection Program

2.1 Current Fire Protection Licensing Basis

2.2 NRC Acceptance of Fire Protection Licensing Basis

Guidance / Changes

◆ RAIs

- Editorial Comments

◆ Draft RG 1.205

- No specific reference

◆ Draft SRP 9.5.1.2

- No specific reference

◆ NEI 04-02

- No changes to NEI 04-02
- Include in LAR Template

Section 3 – Transition Process

LAR Template

Purpose: Provide an overview of the Transition Process

3.0 Transitions Process

- 3.1 Background
- 3.2 NFPA 805 Process
- 3.3 NEI 04-02 – NFPA 805 Transition Process
- 3.4 NEI 04-02 Frequently Asked Questions (FAQs)

Guidance / Changes

- ◆ RAIs
 - Editorial
- ◆ Draft RG 1.205
 - No specific reference
- ◆ Draft SRP 9.5.1.2
 - No specific reference
- ◆ NEI 04-02
 - No changes to NEI 04-02
 - Include in LAR Template

Section 4.1 – Fundamental FP Program

LAR Template

Purpose: Summarize methodology used to determine compliance with NFPA 805 Chapter 3.

4.1 Fundamental Fire Protection Program and Design Elements

4.1.1 Overview of Evaluation Process

4.1.2 Results of the Evaluation Process

4.1.2.1 NFPA 805 Chapter 3 Requirements Met or Previously Approved by the NRC

4.1.2.2 NFPA 805 Chapter 3 Requirements Requiring NRC Approval

4.1.2.3 NFPA 805 Chapter 3 Requirements Requiring Clarification of Prior NRC Approval

4.1.3 Definition of Power Block and Plant

Guidance / Changes

◆ RAIs

- Compliance Statements by subsection
- Cross-reference to EEEEs in B-1
- Previous Approval details in B-1
- More detail on elements requiring approval 50.48(c)(2)(vii) Attachment L

◆ Draft RG 1.205

- Section C.2.2.2, C.2.3.1, C.2.3.2

◆ Draft SRP 9.5.1.2

- Section III.2, III.3.2.1

◆ NEI 04-02

- Modify processes in NEI 04-02 Section 4.3.1 and Appendix B-1 (FAQ 07-0036)
- Include in LAR Template

Section 4.2 – Nuclear Safety Performance Criteria

LAR Template

Purpose: Demonstrate compliance with NFPA 805 Section 2.4.2

4.2 Nuclear Safety Performance Criteria Transition Review

4.2.1 Nuclear Safety Capability Assessment Methodology Review

4.2.1.1 Overview of Evaluation Process

4.2.1.2 Results from Evaluation Process

Guidance / Changes

◆ RAIs / Template

- Cold shutdown
- High – Low Pressure Interface

◆ Draft RG 1.205

- C.3.3

◆ Draft SRP 9.5.1.2

- No specific reference

◆ NEI 04-02

- Modify guidance to point out High-Low Pressure treatment
- TF decision pending on Cold Shutdown
- Include in LAR Template

Section 4.2 – Nuclear Safety Performance Criteria

LAR Template

Purpose: Demonstrate compliance with Nuclear Safety Performance Criteria NFPA 805 Section 1.5.1 on a fire area basis (NFPA 805 § 2.4.2.4)

- ◆ Demonstrate achievement of Nuclear Safety Performance Criteria
- ◆ Summarize Licensing Actions/EEEEs
- ◆ Identify NFPA 805 Compliance Strategy
 - Deterministic
 - Performance-Based

4.2 Nuclear Safety Performance Criteria Transition Review

4.2.2 Fire Area-by-Fire Area Transition

4.2.2.1 Overview of Evaluation Process

Guidance / Changes

◆ RAIs / Template

- Fire Risk Evaluation vs Change Evaluation
- Additional Risk of Recovery Actions
- Required FP Systems and Features

◆ Draft RG 1.205

- C.2.4

◆ Draft SRP 9.5.1.2

- Section III.3.2

◆ NEI 04-02

- Change Process versus Fire Risk Evaluations
- Additional Risk of Recovery Actions
- Include in LAR Template

Section 4.2 – Nuclear Safety Performance Criteria

LAR Template

Purpose: Demonstrate on a fire area basis compliance with NFPA 805 Nuclear Safety Performance Criteria

4.2 Nuclear Safety Performance Criteria Transition Review

4.2.2 Fire Area-by-Fire Area Transition

4.2.2.2 Results of the Evaluation Process

4.2.2.2.1 Results of the Existing Engineering Equivalency Evaluation Review

4.2.2.2.2 Results of the Licensing Action Review

4.2.2.2.3 Results of the Fire Area-by-Fire Area Review

Guidance / Changes

◆ RAIs / Template

- EEEE Transition w/ FAQ 06-008
- Primary Control Station
- Safe & Stable

◆ Draft RG 1.205

◆ Draft SRP 9.5.1.2

- Section III.3.2

◆ NEI 04-02

- Change Process versus Fire Risk Evaluations
- Additional Risk of Recovery Actions
- Include in LAR Template

Section 4.3 – Non-Power Operational Modes

LAR Template

- ◆ 4.3 Non-Power Operational Modes
 - 4.3.1 Overview of Evaluation Process
 - ◆ 4.3.1.1 Review Existing Outage Management Processes
 - ◆ 4.3.1.2 Identify Equipment/Cables
 - ◆ 4.3.1.3 Perform NPO Fire Area Assessments (Identify pinch points)
 - ◆ 4.3.1.4 Manage risks associated with fire-induced vulnerabilities during the outage
 - 4.3.2 Results of the Evaluation Process

Guidance / Changes

- ◆ Purpose
 - Demonstrate compliance with Nuclear Safety Performance Criteria NFPA 805 Section 1.5 on a fire area basis during Non-Power Operational Modes
- ◆ RAIs
 - Breaker Coordination Questions
- ◆ Draft RG 1.205
 - Section 2.2.5
- ◆ DRAFT SRP 9.5.1.2
 - Section III.3.3 consistent with submittals
- ◆ NEI 04-02
 - Summarize s
 - Include in LAR Template

Section 4.4 – Radioactive Release Performance Criteria

LAR Template

- ◆ 4.4 Radioactive Release Performance Criteria
 - 4.4.1 Overview of Evaluation Process
- ◆ 4.4.2 Results of the Evaluation Process

Guidance / Changes

- ◆ Purpose
 - Demonstrate compliance with NPFA 805 Section 1.5.2
 - ◆ Reviewed Pre-Fire Plans
 - ◆ Reviewed Fire Response Training Modules
 - ◆ Modified process as necessary
- ◆ RAIs
 - Changes to template - format
 - ◆ FAQ 08-0056 Table format
- ◆ Draft RG 1.205
 - Section 2.2.6
- ◆ Draft SRP 9.5.1.2
 - Section III.4