

Draft NFPA 805 Safety Evaluation Outline

- 1.0 Introduction
 - 1.1 Background (history lesson on NFPA 805)
 - 1.2 Requested Licensing Action (what are they asking for?)
 - 1.3 Description of NFPA 805 Transition (high level bullets describing transition)
 - 1.4 References for Section 1.0
- 2.0 Regulatory Evaluation
 - 2.1 Applicable Regulations
 - 2.2 Applicable Staff Guidance (RGs, SRP)
 - 2.3 Interim Staff Positions (NFPA 805 Frequently Asked Question Process)
 - 2.4 Orders, License Conditions, Technical Specification Changes and FSAR Changes
 - 2.4.1 Orders
 - 2.4.2 License Conditions
 - 2.4.3 Technical Specifications
 - 2.4.4 FSAR Changes
 - 2.5 Rescission of Exemptions
 - 2.6 Self Approval Process for Fire Protection Program Changes (Post-Transition)
 - 2.7 NFPA 805 Transition Program Implementation
 - 2.7.1 Schedule
 - 2.7.2 Modifications
 - 2.8 Confirmatory Items
 - 2.9 References for Section 2.0
- 3.0 Technical Evaluation
 - 3.1 Fundamental Fire Protection Program and Design Elements
 - 3.1.1 Compliance with NFPA 805 Chapter 3
 - 3.1.2 Power Block
 - 3.1.3 Electrical Raceway Fire Barrier Systems (ERFBS)
 - 3.1.4 Performance-Based Methods for NFPA 805 Chapter 3 Elements (10 CFR 50.48(c)(2)(vii))
 - 3.1.5 References for Section 3.1
 - 3.2 Nuclear Safety Capability Assessment Methods
 - 3.2.1 Compliance with NFPA 805 Section 2.4.2
 - 3.2.2 Feed and Bleed (10 CFR 50.48(c)(2)(iii))
 - 3.2.3 Assessment of Multiple Spurious Operations
 - 3.2.4 Transition of Operator Manual Actions to Recovery Actions
 - 3.2.5 Fire Protection Assessment during Non-Power Operational Modes
 - 3.2.6 References for Section 3.2
 - 3.3 Fire Modeling
 - 3.3.1 Model Utilization in the Application
 - 3.3.2 Models Used
 - 3.3.3 References for Section 3.3
 - 3.4 Fire Risk Assessments
 - 3.4.1 Fire PRA Technical Adequacy
 - 3.4.2 Defense in Depth and Safety Margins
 - 3.4.3 Fire Risk Evaluations/Plant Change Evaluations (cause/effect relationship)
 - 3.4.4 Additional Risk Presented by Recovery Actions
 - 3.4.5 Risk-Informed, Performance-Based Alternatives to Compliance with NFPA 805 (10 CFR 50.48(c)(4))
 - 3.4.6 Cumulative Risk and Combined Changes
 - 3.4.7 References for Section 3.4

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- 3.5 Nuclear Safety Capability Assessment Results by Fire Area
 - 3.5.1 Deterministic
 - Exemptions/Deviations
 - Assessment of Suppression System Impact on Safe Shutdown
 - Required FP Systems (Suppression & Detection)
 - 3.5.2 Performance-Based
 - Exemptions/Deviations
 - Assessment of Suppression System Impact on Safe Shutdown
 - Variations from Deterministic Requirements
 - Increased Risk of Recovery Actions
 - Required FP Systems (Suppression & Detection)
 - Integrated Assessment of Risk, Defense-in-depth and Safety Margins
 - 3.5.3 Fire Protection during Non-Power Operational Modes
 - 3.5.4 Radioactive Release Performance Criteria
 - 3.5.5 References for Section 3.5
- 3.6 NFPA 805 Monitoring Program
 - 3.6.1 References for Section 3.6
- 3.7 Program Documentation, Quality and Configuration Management
 - 3.7.1 Documentation
 - 3.7.2 Configuration Management
 - 3.7.3 Engineering Analysis Quality
 - Review
 - Qualification of Users
 - Verification & Validation of Models
 - Limitations of Use
 - Uncertainty Analysis
 - 3.7.4 Fire Protection Quality Assurance Program
 - 3.7.5 References for Section 3.7
- 4.0 Regulatory Commitments
 - 4.1 Confirmatory items
 - 4.2 License Condition
- 5.0 Final No Significant Hazards Consideration
- 6.0 State Consultation
- 7.0 Environmental Consideration
- 8.0 Conclusion
- 9.0 References