September 15, 2010

MEMORANDUM TO: Alexander R. Klein, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Daniel M. Frumkin, Team Leader **/RA/**
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 23, 2010, PUBLIC MEETING OF THE NUCLEAR REGULATORY COMMISSION FIRE PROTECTION STEERING COMMITTEE

On August 23, 2010, the U.S. Nuclear Regulatory Commission (NRC) Fire Protection Steering Committee (the Committee) held a public meeting with industry stakeholders to discuss current fire protection issues. The memorandum establishing the Committee is in the NRC's Agencywide Documents and Management System (ADAMS) as accession number ML072640666. The main topics discussed were National Fire Protection Association Standard 805 (NFPA 805) status, status of fire-induced circuit failure and post-fire operator manual actions (OMAs), and the upcoming Advisory Committee on Reactor Safeguards (ACRS) Committee review of NFPA 805 implementation. The draft meeting agenda is in ADAMS as accession number ML102090225.

A list of meeting participants is included in Enclosure 1. Slides from the meeting are included in Enclosure 2. The following is a summary of meeting discussion and actions resulting from the meeting. The discussion below focuses on where there were deviations from the information presented in the slide presentations or where actions were identified.

Enclosure:
As Stated

CONTACT: Daniel Frumkin, NRR/DRA
301 415-2280

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1. ACRS Review of NFPA 805 Program – Slide 4

   The ACRS will conduct a review of the current state of licensee efforts to transition to NFPA 805 as described in the June 25, 2010, Commission Staff Requirements Memorandum (reference SRM 100609B). The ACRS subcommittee meetings on this topic are planned for November 16 and December 13-14, 2010, in Rockville, Maryland. Although industry stakeholders expressed concerned about the affect of ACRS activities, the NRC does not expect this review to affect the ongoing regulatory activity since the ACRS has reviewed the implementation guidance. NEI indicated they had a list of stakeholders who would be prepared to discuss the review with ACRS representatives.

2. NFPA 805 Program – Slides 5, 6 and 7

   NRC staff indicated that a revised NUREG/CR-6850 with all of the closed NFPA 805 frequently asked questions would be published within the next month or two. The NRC's Office of Nuclear Reactor Regulation and Office of Nuclear Regulatory Research will work with industry stakeholders, the Nuclear Energy Institute (NEI), Electrical Power Research Institute (EPRI) and the Institute of Nuclear Power Operations (INPO) on improving the state of the art of fire probabilistic risk analysis (PRA) to support implementation of NFPA 805. NRC staff indicated that the effort will initially focus on fire PRA, but in the future plan to support other PRA activities. Industry stakeholders had concerns regarding how this effort would address other PRA issues. NRC staff indicated that they understood the concern.

   Action 1: NRC and industry stakeholders will develop list of fire PRA related milestones with priorities and schedules by the end of calendar year 2010.

   NRC staff inquired regarding the schedule for industry stakeholders to complete the license amendment request (LAR) template. The LAR template is being worked under Frequently Asked Question 10-058. NEI staff indicated that working with NRC staff, the template should be completed by the end of the calendar year. NEI staff also indicated that based on their information, four licensees plan to submit before the end of the enforcement discretion period. The end of discretion period is six months after the Oconee safety evaluation is published by the NRC. The NRC staff indicated that a change to the enforcement policy at this time is unlikely.

3. Circuits and Manual Actions – Slides 8, 9 and 10

   NEI staff indicated that the majority of the changes to Nuclear Energy Institute (NEI) 00-01, "Guidance for Post-Fire Safe Shutdown Circuit Analysis," from revision 2 to 3, would be clarifications. The NRC staff requested that NEI staff provide assurance that changes were clarifications and not new positions that the NRC staff may need to endorse formally before broad licensee implementation. At a later date, NEI staff informed NRC staff that NRC endorsement would be necessary.

   Action 2: NEI staff will examine planned changes to NEI 00-01, Revision 3, to determine if the planned changes are needed for the implementation of multiple spurious actuation reviews. NEI will provide an estimated date for completion of NEI 00-01, Revision 3.

During the meeting, industry stakeholders commented that, due to refueling outage schedules, plant modifications may not be completed by the end of the enforcement period (November 2, 2012) as outlined in Enforcement Guidance Memorandum 09-002. This raised questions about the application of enforcement discretion.

Action 3: NRC staff will consider the application of enforcement discretion in this context and get back to industry stakeholders.

The NRC staff discussed the industry use of enhanced operator rounds used where licensees hadn't completed their multiple spurious actuation analysis. The NRC staff stated that if the licensee hadn't completed their analyses, then the licensee should consider this a noncompliance and implement the approved fire protection program compensatory measures, and not what have been described as enhanced operator rounds. NEI staff indicated they would look into the use of enhanced operator rounds.

Action 4: NEI staff will review the implementation of enhanced operator rounds as a compensatory measure for multiple spurious actuations. NEI will provide an estimated date for completion of this item.

NEI staff stated that the additional multiple spurious scenarios that had been developed as part of the first set of expert panels had been shared with the appropriate licensees.

The NRC staff indicated that the majority of the Fire Protection Steering Committee issues have been closed and the NRC staff will consider sun setting the Committee. NEI representatives indicated that the NEI Fire Protection Working Group, the industry counterpart to the Committee, had already been sunset.

Based upon the possibility of sun setting the Committee, no plans were made for future meetings.

NRC PUBLIC FIRE PROTECTION STEERING COMMITTEE
LIST OF ATTENDEES

August 23, 2010

Name	Organization
Jack Grobe	NRR
Alex Klein	NRR/AFPB
John Segala	NRO/DSRA
Mark Henry Salley	RES/DRA
Mark Cunningham	NRC/NRR
Gerry Gulla	OE
Harry Barrett	NRR/DRA
Gary Cooper	NRR/DRA
Dan Frumkin	NRR/DRA
Donnie Harrison	NRR/DRA
Chuck Moulton	NRR/DRA
Tim Kobetz	NRR/DIRS
John Lai	ACRS
Vicki Foster	OIG/AIGA
John Rogge*	Region I
Keith Young*	Region I
Norman Merriweather*	Region II
Gerald Wiseman*	Region II
McKenzie Thomas*	Region II
Rodney Fanner*	Region II
Ken O'Brian*	Region III
Bob Daley*	Region III
Neil O'Keefe*	Region IV
Alex Marion	NEI
Tom Basso	NEI
Nancy Chapman*	Bechtel Power Corporation
Larry Young*	Entergy
Jessica Walker*	Entergy
Rich Bashall*	AREVA
Steven Dolley*	Platts
Bob Kalantari*	EPM

* Participated via phone or video conference