



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 7, 2011

LICENSEE: Licensees Planning to Transition to NFPA 805

FACILITY: Facilities Planning to Transition to NFPA 805

SUBJECT: SUMMARY OF FEBRUARY 9, 2011, MEETING WITH THE NUCLEAR ENERGY INSTITUTE AND LICENSEES ON TRANSITIONING TO NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805

On February 9, 2011, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), the Nuclear Energy Institute (NEI), and representatives of licensees planning to transition to National Fire Protection Association (NFPA) Standard 805 at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss questions related to the transition of non-pilot licensees to NFPA 805, pursuant to Title 10 of the *Code of Federal Regulations*, with the non-pilot licensees, the NEI, and other external stakeholders. A list of attendees is provided as Enclosure 1.

The NRC staff's presentation closely followed the slides provided as Enclosure 2, "NFPA 805 Transition," and Enclosure 3, "Status of External Events PRA [Probabilistic Risk Assessment] Modeling at the U.S. Nuclear Regulatory Commission." Highlights of the discussions included the following:

- **Enforcement Discretion** – There was an extended discussion concerning the current enforcement policy and how enforcement discretion would be handled for any facility that would be late in submitting their application. Specifically, if an application is late and enforcement discretion is lost, would it be re-applied once the application is submitted? The NRC staff's response was that the current enforcement policy does not address this situation but that licensees cannot rely on continued enforcement discretion if their submittals are late.
- **NRC Staff Resources** – Based upon the experience gained from the pilot plants (i.e., Harris and Oconee), the staff estimates that the non-pilot plant reviews will require between two and four full-time equivalent employees for each license amendment request (LAR) dependent upon the complexity of the application. Assuming current resources and flat funding, the staff estimated that reviews of all LARs would extend to approximately fiscal year 2019. However, the staff stated that activities are currently underway to expand resources available to complete these reviews and that completion of the LAR reviews may be completed before 2019.
- **Prioritization of LAR Reviews** – The current schedule calls for over 20 LAR submittals to be in-house by the end of June 2011. The NRC staff acknowledged that concurrent reviews will not be done and that a prioritization will be performed. The staff stated that the prioritization criteria and sequencing are still under development. It is expected that overall net safety improvement and completeness of the LAR will be major factors in the criteria.

- **Pre-submittal Meetings with the NRC Staff** – The NRC staff recognized that the current completeness of the individual LAR packages vary widely. The staff understands that some LAR packages are currently complete and robust, some LAR packages have known deficiencies such as incomplete PRAs or lack of peer reviews, and some licensees clearly expect to miss their scheduled submittal date. Licensees expressed their concern regarding the LIC-109 acceptance reviews. The staff acknowledged that plant-specific bases may exist to justify submittal of an incomplete LAR package. The staff recommended that those licensees that have known deficiencies or incomplete LAR packages schedule a public meeting with the staff. The purpose of the meetings would be to discuss the known deficiencies and determine whether the LARs would be expected to pass the LIC-109 acceptance reviews.
- **Consistency of NRC Staff Review** – Concern was expressed regarding the consistency of NRC staff review particularly if the LAR review schedule is extended over multiple years. In addition to review teams that will be created to review the LARs, a lead senior technical manager will provide oversight of the review teams to maintain consistency in the technical review. Furthermore, while licensees will deal directly with their normally assigned NRC project manager, a senior NRC project manager will also be assigned to provide oversight to maintain consistency within the licensing process.
- **Use of SharePoint** –The SharePoint process was effective during the pilot plant reviews. The Harris and Oconee licensees voluntarily ran and operated the SharePoint site. The NRC staff handled the SharePoint site as “view-only” and was directed not to download information. All pertinent information necessary to support the final NRC review was submitted separately on the docket by the licensees. The staff will not require use of a SharePoint site. The decision to implement and operate a SharePoint site will be made by the licensees.
- **Communications** – The NRC staff emphasized the need for continued effective communication between the licensees and the staff. The staff stated that senior management of each licensee planning to transition to NFPA 805 will be contacted in the near future to ascertain the status of the individual LARs.

A number of the slides in Enclosure 2 stated that the item would be discussed during the meeting. The following provides clarification to these slides:

In response to the question: “What is the level of detail that a licensee must submit to NRC under Oath & Affirmation about licensee’s NFPA 805 Monitoring Program?” on slide 28, the NRC staff responded that the LAR must describe the structure of the Monitoring Program, including the criteria for important decisions such as how systems, structures, and components are screened into the monitoring program and when corrective actions need to be taken. Licensees should demonstrate that the process to be followed will ensure that the assumptions used in the Fire Risk Evaluations will remain valid (the staff encourages licensees to identify how the thresholds being proposed will assure that the numbers in the PRA will not be exceeded).

In response to the questions related to Safe and Stable on slides 29, 30, and 31, the NRC staff responded that licensees should utilize the guidance provided in Frequently Asked Question (FAQ) 08-0054, "Demonstrating Compliance with Chapter 4 of NFPA 805."

In response to the question "What is the scope of analysis and level of detail required to be submitted for non-pilot, non-power operations?," the NRC staff responded that licensees should utilize the guidance provided in FAQ 07-0040, "Non-power Operations Clarifications."

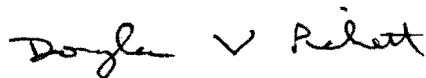
In response to the questions related to Fire Protection Defense-in-Depth on slides 34, 35, and 36, the NRC staff responded that licensees should utilize the guidance provided in FAQ 08-0054, "Demonstrating Compliance with Chapter 4 of NFPA 805."

Members of the public were in attendance and a number of Public Meeting Feedback forms were received. Comments received included the following:

1. More effort should have been exerted to address enforcement discretion. The commenter believed that the NRC staff is taking a "wait and see" approach with the hope that the issue will be not require notification of the Commission.
2. This type of meeting should be considered quarterly to complement the monthly FAQ meetings. The commenter believed that industry found this meeting very productive and future meetings will maintain a common level of understanding by licensees regarding NRC expectations.
3. The NRC staff should continue to encourage more discussions and questions on this issue. The commenter requested that the NRC staff be more diligent in defining acronyms in their slides and presentations.

These comments have been forwarded to the NRR Senior Communications Analyst who will forward them to the Office of the Executive Director for Operations.

Please direct any inquiries to me at 301-415-1364 or Douglas.pickett@nrc.gov.



Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

MEETING ATTENDANCE FORM

Subject: Transition of Non-Pilot Licensees to NFPA 805

Date: February 9, 2011 Location: NRC Headquarters, Rockville, MD

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NAME	ORGANIZATION
John Lai	ACRS
Charles Moulton	NRR/DRA/AFPS
Vincent Rubano	Next Era Energy
Donnie Harrison	NRR/DRA/APLA
Paul Law	NRR/DRA
David Goforth	Duke Energy
Ned O'Keefe	NRC/PIV
Roger Wing	Ameren Missouri - Callaway
Jerome Dower	NRC/NRR
Tom Basso	NEI
Janet Ecker	Morgan Lewis
Gerald Laignon	SC&EG
Larry Parker	STARS
John Merrill	Dominion
Thomas Shudak	OPPD
Jeff Cima	PE
Thomas Juras	EPM
Bob Richter	Sathean Cal. Edison
Emily Fast	Ameren Missouri - Callaway
JOHN SEVENS	NPPD - Cooper Station
Bill Victor	NPPD - Cooper



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NAME	ORGANIZATION
Bob NAJUCH	FENOC Davis Bessee
DAN MAC DOUGALL	AEP
Greg Harris	Callaway Plant
Michael Townsend	Dominion Kennerly
LARRY TODD STAFFORD	TVA - Browns Ferry
Fleur de Peralta	Tri-En Corporation
Paul Onellette	EPM
JOE Waters	American Elec. Pwr.
SAL DACCENASCOLO	Southern Cal Edison
JS Hyslop	NRC
GARY COOPER	NRB
David Stroup	RES/DRIA
Jim MIKSA	Entergy / PALISADES
Michael Aetche	Callaway American UK
Jeff Gromatzky	EVERCON
Bob Dukes	EVERCON
Tom Swiatcieki	Entergy - Palisades
Pablo Guardado	Entergy - Corporate
Jessica Walker	Entergy - ANO
Larry Young	Entergy - ANO
Doug Kibler	Entergy Corporate

[illegible]

SAMSON LEE
Brian Metzger
FRANCY MANSWIE
Colin Keller
GREGORY LANG
Allen Howe
ITENER HEGEM
Faridch Sebe
Kelly TAYLOR
Jeff Mitman
Fernando Ferrante
Naseem IGRA
Daniel Frumkin
Terry Cribbe
Ray Mollucci
Amy Hazulhoff
Paul Boulden
Veronica Rodriguez
Dorey Broadbent
Rob Jackson
Elizabeth Kleinsorg
STEVEN A. LARK
JOHN J. CURHAM
Peter Marzafiero
Edmund Tyler
BOB DUKES
Bob Kalantari

NRR/DRA
NRR/DRA
First Energy
First Energy
SNC
NRR/DORL
FIRST ENERGY
NRC/NRR/DORL
Appendix R Solutions Inc.
NRC/NRR/DRA/APOB
NRC/NRR/DRA/APOB
NRR/DRA/APOB
NRR/DRA/APOB
Tennessee Valley Authority
~~NRR/DRA/APOB~~
Enclon - Prairie Island
Appendix R Solutions, Inc.
NRR/DRA
NRR/DORL
Kleinsorg Group
Kleinsorg Group
NRC/NRR/DRA
PROGRESS ENERGY, CR3
Constellation Energy
Constellation Energy
NISYS - Emerson
EPM INC

NFPA 805 Transition

Public Meeting
2/9/2011

Meeting Purpose

To discuss questions related to the transition of non-pilot licensees to National Fire Protection Association Standard 805, pursuant to Title 10 of the *Code of Federal Regulations* Part 50.48(c), with the non-pilot licensees, the Nuclear Energy Institute, and other external stakeholders.

Discussion Topics

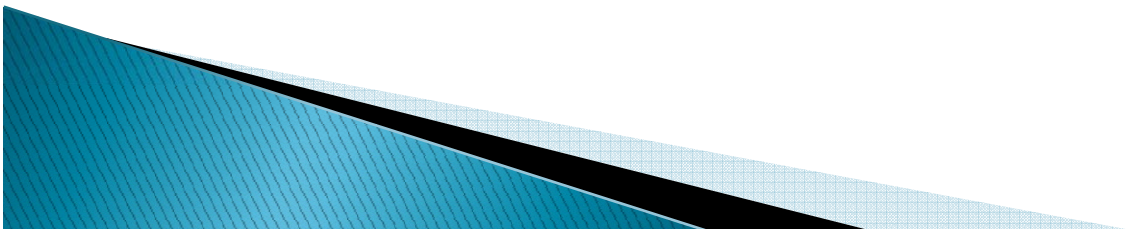
- ▶ Enforcement Discretion
- ▶ LAR Review Prioritization and Sequencing
- ▶ Major Licensing Actions Concurrent with the NFPA 805 LAR Review
- ▶ LAR Review Processes
- ▶ License Condition Overview
- ▶ LAR Technical Content Expectations
- ▶ PRA Topics

Enforcement Discretion (1)

- Please expand upon the various enforcement discretion scenarios.
For example, what can a licensee expect if they submit their LAR after their enforcement discretion period ends?
- If a licensee submits their LAR more than six months after the staff issues the second pilot SE, will the licensee receive enforcement discretion during the LAR review period, i.e. from the LAR submittal date through the end of the review period?
- What is the status of enforcement discretion between the time of six months after the second Pilot SE and the licensee LAR submittal, assuming the licensee LAR submittal occurs after the six month mark above?
- If a licensee cannot meet the requirement of submitting the LAR six months after the second Pilot SE is issued or their original commitment date – what does the NRC expects from the licensee?

Enforcement Discretion (2)

- If a formal notification via a commitment change letter is required, should this letter request an extension of the enforcement discretion period?
- What criteria will the NRC apply to not pursue immediate enforcement action?
- Does a licensee retain enforcement discretion if the LAR submittal does not pass the LIC-109 acceptance review?



Enforcement Discretion (3)

- Will a particular issue covered by enforcement discretion continue to be covered under enforcement discretion after the SE is issued if resolution requires that a modification be made and that modification is on the list of modifications to be completed for the 805 transition?
- The modification will be incorporated into the License Condition. Enforcement Discretion no longer applies, but the new license includes consideration that the modification will not be complete until a later date than the SE issue date.

LAR Review Prioritization and Sequencing

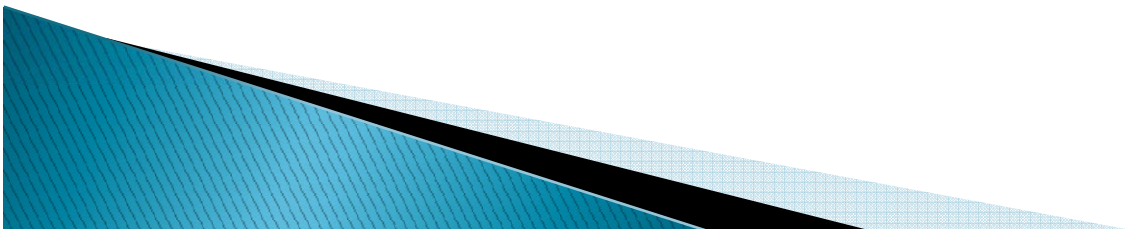
- How does the NRC intend to manage the concurrent review of 20+ NFPA 805 LARs?
- Form review teams.
- Populate teams with experienced technical reviewers.
- Augment with contractors (a number of whom have worked on pilot LAR reviews).

LAR Review Prioritization and Sequencing

- Will the reviews be sequenced (as for license renewal)?
If so, what will be the criteria for prioritization?
- Staff is in the process of developing criteria for prioritization
- Some criteria considered are:
 - Completeness of submittal
 - Gain in safety via transition to NFPA 805.

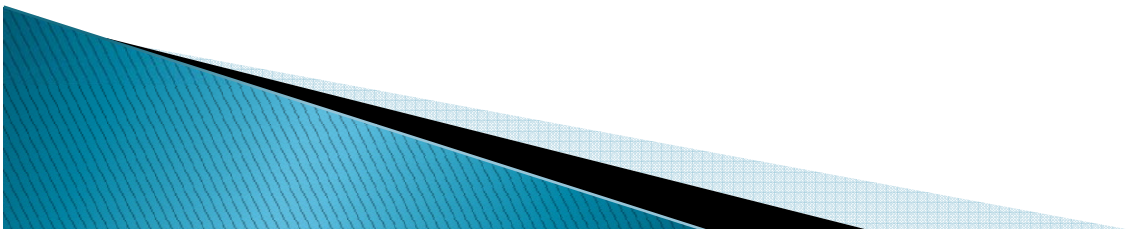
LAR Review Prioritization and Sequencing

- Will the prioritization be provided before the end of the enforcement discretion period such that plants that are lower in the NRC's priority be provided more time to work on their LAR submittal?
- Refer to prior discussion regarding enforcement discretion.



LAR Review Prioritization and Sequencing

- Based on the lessons learned from the Pilots, what will the NRC fees be for the non-pilots for LAR reviews?
Will the prioritization affect the fee?
- Based on the lessons learned, NRC expects to expand 2–4 FTEs / LAR reviews.
- Review efforts will vary depending upon factors.



Major Licensing Actions Concurrent with the NFPA 805 LAR Review

- How do the power uprates and license renewal processes interact with the LAR review/transition process?
- The LAR and the associated PRA may reflect a future plant (crediting planned modifications is acceptable).
 - As such, for EPU, a licensee may assume power levels that it plans to operate at, when performing the PRA, OR treat the increase in power as a post-transition change.
 - 10 CFR 50.48(c) requires the licensees to ensure that the PRA reflects the as-built as-operated plant.
 - Follow RG 1.200 and ANS/ASME guidance to update the PRA and perform the necessary peer reviews.

LAR Review Processes

- Will each licensee work with their NRR PM on the 805 LAR submittal or will one NRR PM be assigned as the contact for all the 805 LARs? If the NRR PM remains assigned to the plant, is training being provided for the PMs on NFPA 805?
 - The LARs will be handled as routine licensing actions by project managers.
 - A lead senior project manager in NRR\DORL will provide oversight to maintain consistency for NFPA 805 LARs.
 - A lead senior technical manager will provide oversight to maintain consistency for technical reviews.
 - Training will be conducted for project managers and technical reviewers to provide a consistent understanding of licensing and technical issues.

LAR Review Processes

- For non-pilots, does the NRC expect licensees to conduct a pre-submittal meeting with the NRC staff prior to submittal?
- Staff does not require individual pre-submittal meetings for any licensee who believe they have a complete LAR.
- Licensees who believe their application may not meet all LIC-109 criteria are encouraged to request a pre-submittal meeting.

LAR Review Processes

- ❖ New Information Post-LAR-Submittal
 - If there is the possibility of re-work, how will this be resolved?
 - Similar to any new Operating Experience; licensees should review the new information, and if it makes a material difference in the application, perform analyses as necessary and supplement the application with any new information

LAR Review Processes

- ❖ New Information Post-LAR-Submittal
 - How does the NRC intend to handle new information developed after a licensee has submitted their LAR?

See previous slide.

LAR Review Processes

- How should potentially unrelated plant changes be addressed during the LAR review period?
- The NRC staff discourages the inclusion of items not related to NFPA 805 in the LAR submittals.

LAR Review Processes: LIC-109

Acceptance Reviews

- What is the role of the NRC's acceptance review process in the NFPA 805 LAR review effort? (LIC-109); Will the NRC be following this process for the non-pilots?
- NRC will conduct acceptance reviews consistent with LIC-109 for the non-pilots.
- Process can be adjusted to accommodate unique circumstances associated with NFPA 805 LARs

LAR Review Processes

- How will the NRC ensure there is consistency in the LAR reviews? Will the NRC use the LAR template as the standard even though not officially endorsed? In other words, if the licensee follows the NEI LAR template, will the application contain sufficient information for the NRC acceptance reviews?
 - The staff held a significant number of public meetings to provide staff comments on the development of the LAR template.
 - The staff encourages use of the LAR template.
 - Use of the LAR template will enhance consistency of the LAR reviews.
 - Use of the LAR template, by itself, may not ensure that the application contains sufficient information, i.e., each LAR will be reviewed on its own merits.

LAR Review Processes

- Does the NRC expect to conduct LAR audits of the 805 non-pilot plants?
- If conducting a site visit appears to enhance the review efficiency, staff may perform a site visit.

LAR Review Processes

- Will the RAI process for non-pilot plants be handled any differently from the pilots?
- The RAI process will be conducted similar to that of a routine licensing action.

LAR Review Processes

- The pilot plants used SharePoint to assist the RAI process. Should the non-pilots expect to do the same?
- SharePoint process worked effectively during the pilot plant reviews.
- The decision to use SharePoint will be made by the licensee, i.e., licensee chooses to establish and maintain the SharePoint site.

LAR Review Processes

- What lessons learned (regarding the communication interface between the licensee and the NRC reviewers) will be applied from the Pilots and can some ground rules be established to make the communication and interface be even more effective and efficient?
- NRC staff is willing to use normal licensing review processes tools (e.g., SharePoint, plant visits) to enhance effectiveness and efficiency.

License Condition Overview

- What can non-pilot licensees expect to see in their license conditions? Will the license condition be different from what is in the current version of Regulatory Guide 1.205?
- Staff plans to engage the NEI task force via the FAQ process to revise the license condition using lessons learned from the two pilot plants.

License Condition Overview

- How will implementation items be handled for the non-pilots?
- NRC will consider the significance of implementation items when determining if they should be included in the license condition.

License Condition Overview

- How will any implementation items be finally closed-out?
- Licensees do not have to report final close-out to NRC.
- Implementation will be reviewed during periodic NRC fire protection inspections.

License Condition Overview

- What are the boundaries of the post-transition self-approval process?
- Licensee must follow the license condition of the 805 SE, and other applicable regulations to determine changes that require prior staff approval.

License Condition Overview

- Are there some changes that must always receive specific NRC approval?
- Licensee must follow the license condition of the 805 SE, and other applicable regulations to determine changes that require prior staff approval.

LAR Technical Content Expectations

- What is the level of detail that a licensee must submit to NRC under Oath & Affirmation about licensee's NFPA 805 Monitoring Program?
- To be discussed at the meeting

LAR Technical Content Expectations

❖ Safe and Stable

- What is the NRC's position regarding this issue?
 - How does it align with the definition in NFPA 805?
 - See FAQ 08-0054

LAR Technical Content Expectations

❖ Safe and Stable

➤ What information is required by the NRC regarding this issue?

➤ See FAQ 08-0054

LAR Technical Content Expectations

- ❖ Safe and Stable

- What level of detail is required?

- See FAQ 08-0054

LAR Technical Content Expectations

- What is the scope of analysis and level of detail required to be submitted for non-pilot non-power operations?
- Follow the guidance in FAQ 07-0040 and as documented in the pilot submittals

LAR Technical Content Expectations

❖ Defense-In-Depth

- What regulatory significance should be placed on fire protection features that are part of the current licensing basis (CLB) but not required to meet NFPA 805 Chapter 3 or 4 criteria?

- To be discussed at the meeting

LAR Technical Content Expectations

❖ Defense-In-Depth

➤ Is it necessary to maintain fire protection features that are part of the CLB but not required to meet NFPA 805 Chapter 3 or 4 criteria?

➤ To be discussed at the meeting

LAR Technical Content Expectations

❖ Defense-In-Depth

- Is a change evaluation necessary to remove a fire protection feature that is part of the CLB but not required to meet NFPA 805 Chapter 3 or 4 criteria?
- To be discussed at the meeting

LAR Technical Content Expectations

❖ Defense-In-Depth

- Is it sufficient to include in the Monitoring Program those fire protection features that are part of the CLB but not required to meet NFPA 805 Chapter 3 or 4 criteria?

- To be discussed at the meeting

PRA Topics

❖ PRA Peer Reviews

- The NRC performed audits of the pilots' PRAs. What level of review is the NRC expecting to do for non-pilot PRAs (both internal events and fire)?
 - Non-pilots are expected to conform to RG 1.200
 - Audits of any risk-informed submittal can be expected if, for example:
 - There is an excessive number of less-than-Category-II assignments or peer review findings that were resolved with no changes to the PRA
 - There are more than several findings on significant SRs that were resolved with no changes to the PRA
 - Licensee has used new PRA methods

PRA Topics

❖ PRA Peer Reviews

- If the NRC determines that a licensee's peer review (internal events or fire) was deficient, or the findings improperly resolved, what will the NRC do?
- Per RG 1.174 licensee is responsible to establish the technical adequacy of PRA.
- NRC does not perform reviews of the adequacy of individual licensee's peer reviews.
- If the deficiency of the peer review manifests itself during the review of the LAR, staff will rely on the RAI process to engage the licensee.

PRA Topics

❖ PRA Peer Reviews

- How will the issue of peer reviews (internal events or fire) of then-incomplete PRA's (i.e., areas considered non-reviewed during PRA peer review) be addressed?
 - A completed peer review on a completed PRA is the expectation.
 - LARs using a PRA with no peer review do not conform with RG 1.200 and would not be acceptable for review.
 - Otherwise, the licensee should schedule a timely pre-LAR meeting to describe peer review and PRA status at time of LAR and schedule for completing a peer review on a completed PRA.

PRA and PEER Review Acceptance Guidelines for NFPA-805 LARs

PRA Parts Completed	
	Physical Analysis Units Methods
Peer Review on Completed Parts and Findings Resolved	All All
	Most All
	All Most
	Few Few

Color Key

Acceptable for Review

Discuss with Staff

Not Acceptable for Review



PRA Topics

❖ PRA Peer Reviews

➤ Will the NRC accept the use of focused reviews for the incomplete items (for internal events and fire)?

➤ Yes, if completed before the LAR

➤ If not completed before LAR, should be identified in a pre-LAR meeting

PRA Topics

- How will the NRC handle novel (i.e., new) or previously unanalyzed (i.e., unreviewed) PRA methods?
- LAR should ensure that complete descriptions of all methods used (new and unreviewed) are in referenced documents or included in the LAR
- Typically, new PRA methods are endorsed through staff review of Topical or Industry Reports
- Staff does review new methods during LAR reviews but this should be an exception, and any such request should be identified in a pre-LAR meeting

PRA Topics

- What are the regulatory expectations with respect to PRA model maintenance?
 - Plant changes?
 - Method changes?
 - Data changes?
 - Timeframe for updating?
- Regulatory expectations are that model maintenance be consistent with requirements of 50.48(c) and with RG 1.200 endorsement of ASME/ANS PRA standard if not specified in 50.48(c).

PRA Topics

- What are the responsibilities of the licensee when new information leads to increases in CDF? Decreases in CDF?
 - The new information should be incorporated into the PRA if needed for the PRA to reflect the current design and operation of the plant
 - Configuration control process should provide for new information to be considered when needed before incorporation into the PRA
 - The monitoring program shall ensure that the assumptions in the engineering analysis remain valid
 - When evaluating the next fire protection program change, the rule requires that if previous FPP changes have increased risk, the cumulative risk increase of those changes shall be evaluated



Status of External Events PRA Modeling at the US Nuclear Regulatory Commission

Jeff Mitman, Senior Risk Analyst
Fernando Ferrante, Risk Analyst
Office of Nuclear Reactor Regulation
Division of Risk Assessment

February 9, 2011

NRC's Risk Tools Enhancement

- Currently undertaking activities to update and enhance internal risk tools (including external events)
 - Discussed at Public Meeting on March 2010
- NRC maintains 78 Level 1, Internal Events Standardized Plant Analysis of Risk (SPAR) Models
- NRR and RES are collaborating to develop a number of additional models
 - 16 External Events Models (based on IPEEE information) with all hazards applicable to site

SPAR External Events Modeling

- NRC uses risk tools such as SPAR models as input for risk-informed decision-making
 - Significance Determination Process (SDP)
- Staff is cognizant of challenges in developmental models use for regulatory decision-making
- Reflection of most up-to-date/best estimates is a common goal for NRC risk tools enhancement
 - NFPA805 PRA models are up-to-date/best estimates

Information Needs for Modeling

- Scenario description
- Scenario (initiating event) frequency
- Initiating event caused by the fire
- Failed equipment (system/train/component)
- Failed (or affected) operator actions
- Additional operator actions credited and their HEPs

Example Completed Table

	Scenario Symbol	Scenario Description	Ignition Frequency	Equipment Failed	Scenario (Initiating Event) Frequency	CCDP	CDF	Equipment Lost (in PRA model)	Initiating Event Caused (transfer)	Comment (or new operator actions)
1	FRI-RB06-01	RB06 Fire Scenarios with no ECCS damage	5.95E-03	Main Condenser	2.56E-03	1.30E-05	3.32E-08	Condensate pumps	TRANS	...
2	FRI-RB06-02	RB06 Fire Scenarios with RHR Division I damage	5.95E-03	One RHR Division	8.41E-04	9.33E-04	7.85E-07	RHR pumps A and C	TRANS	...
3	FRI-RB06-03	RB06 Fire Scenarios with RHR Divisions I & II damage	5.95E-03	All RHR	2.55E-03	7.42E-05	1.90E-07	RHR pumps A, B, C, D	TRANS	...

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/ra/

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Enclosure 3: ML110590927

Meeting Summary ML110590918

OFFICE	LPL1-1/PM	LPL1-1/LA	AFB/BC	LPL1-1/BC
NAME	DPickett	SLittle	AKlein	NSalgado
DATE	03/03 / 11	03 / 02 / 11	03 / 07 / 11	03 / 07 / 11

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