



NUCLEAR ENERGY INSTITUTE

John C. Butler
SENIOR DIRECTOR
ENGINEERING & OPERATIONS SUPPORT
NUCLEAR GENERATION DIVISION

March 29, 2011

Mr. Frederick D. Brown
Director, Division of Inspection and Regional Support
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Inspection Procedure IP-71111.05XT, *Fire Protection – NFPA 805 (Triennial)*

Project Number: 689

Dear Mr. Brown:

A draft revision of the triennial fire protection inspection procedure (IP-71111.05XT, *Fire Protection – NFPA 805*) was made available to the public and discussed at a March 15, 2011 public meeting. This procedure, when final, will provide guidance for performing triennial inspections at the stations that have transitioned to NFPA 805. NEI appreciates the opportunity to provide feedback on this procedure on behalf of the licensees that have transitioned, and will be transitioning, to 10CRF50.48(c).

Comments and recommended changes to the inspection procedure are provided in Attachment 1 to this letter. Our comments are in three general areas; alignment to the NFPA 805 regulations, alignment to the Safety Evaluation (SE) and Licensing Amendment Request (LAR) template structure, and increased focus on the performance-based approach.

While all of the recommended changes are expected to improve the use and utility of the document, we believe it is especially important that those changes necessary to achieve consistency with associated regulatory language be made prior to first use. These changes are in bold and noted with an asterisk (*) in Attachment 1. Attachment 2 identifies a suggested outline to structure the inspection procedure in line with the regulatory guidance documents.

Mr. Frederick D. Brown

March 29, 2011

Page 2

If you have any questions regarding this document, please feel free to contact me at 202-739-8108; jcb@nei.org or Thomas Basso at 202-739-8025; tbb@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

Attachments

c: Mr. Jack Grobe, NRR, NRC
Mr. Alex R. Klein, NRR/DRA/AFPB, NRC
Mr. Tim J. Kobetz, NRR/DIRS/IRIB, NRC
Mr. Jeremy Bowen, NRC