

NEI NFPA 805 TF Comments on IP71111.05XT

Section	Comment	Suggested Resolution
General	<p>Procedure seems to focus on 're-verifying' analyses that were reviewed and approved in the SE. For example, Section 02.02. Non-Power Operations asks the inspector to verify that the licensee has "defined the key safety functions" etc. This was done to support the LAR and approved in the SE. Shouldn't the focus be on ensuring that the licensee is "sufficiently implementing and maintaining" the non-power operations analysis?</p>	<p>Revise sections 01.01g "adequate and accurate" 02.02, 02.01(a)</p>
General	<p>There is not a clear tie between the objectives in Section 01.01 and requirements 02.02.</p> <p>The order and content of objectives and requirements are not consistent. Nor do they appear to address all the NFPA 805 requirements.</p> <p>Suggest revising the procedure to be consistent with the regulation, SE and LAR templates.</p>	<p>See suggested revision to structure of procedure</p>
General	<p>Overall there is not a strong emphasis or level of detail in terms of the performance-based methods or criteria (including change evaluations). Without such there will be challenges to apply a consistent level of inspection and enforcement from plant to plant.</p>	<p>See suggested revision to structure of procedure</p>
General	<p>Does the annual/quarterly inspection procedure need to be revised to reflect the new NFPA 805 requirements.</p>	<p>Update as necessary.</p>
General	<p>Provide guidance on how this procedure applies during the timeframe between receipt of SE and the effective program implementation date</p> <p>Suggest that guidance be given to the regions to avoid scheduling a triennial during this period. An inspection during this period would not be effective since the license condition has not yet been fully implemented.</p>	<p>Update the inspection procedure</p>

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*General	<p>“Testing” as used in the context in the procedure is not correct. The references to the codes of record (3.8, 3.9, 3.10) specifically call out installed or designed and installed to the specific NFPA Code. Testing is not part of this section of the regulation.</p> <p>Testing is mentioned in NFPA 805 Section 3.2.3(1). It states “...the procedures to accomplish the following shall be Established: Inspection, testing, and maintenance for fire protection systems and features credited by the fire protection program”...</p>	Revise procedure to reflect regulation.
*General	Repairs do not need to be called out separately; they are included in the definition of recovery action.	Remove the specific reference to repairs.
*General	Frequent use of the term Safe Shutdown. The correct NFPA 805 term is nuclear safety capability assessment.	Revise term to Nuclear Safety Capability Assessment or NSCA.
*General	Frequent use of the Term Safety Evaluation Report. Pilots were directed to use the term Safety Evaluation (SE).	Revise term to Safety Evaluation.
Page 1, Inspection Bases – 1st paragraph, 2nd Sentence: “In many cases, the risk posed by fires is comparable to or exceeds the risk from internal events.”	This statement is subjective and can be misleading.	Delete sentence.
*Page 1 – Numbered List	Defense-in-depth discussion does not match NFPA 805.	Revise Defense in Depth to match Section 1.2 of NFPA 805.
*Page 1 – First Paragraph after Numbered List	Should reference appropriate section of NFPA 805 for Goals, Objectives, Criteria	Revise section.
*Page 2 - First Paragraph	There isn't a 'fire protection' goal. If the intention is to capture Chapter 3 then the language should reflect the regulation.	Revise section to be consistent with the regulation.
*01.01 and other sections	radioactive material release	Remove the word 'material'
*01.01.b	“Active alarm, detection and fire suppression systems	Remove the words 'active' and 'features'.

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	<p>and features”</p> <p>Fire detection and suppression are ‘systems’ not ‘features’ in accordance with NFPA 805 definitions.</p> <p>The word ‘active’ is not in the regulation.</p>	
01.01.b	Section 3.5, 3.6 and 3.7 are not conditional to performance requirements	Suggest splitting these sections into those FP systems required by Chapter 3 and those required by Chapter 4.
*01.01.b and c	<p>The procedure states: “required to meet the nuclear safety performance criteria.”</p> <p>The regulation states “required to meet the performance or deterministic requirements of Chapter 4”.</p>	Revise wording to meet regulation.
*01.01.b and .c	“...to the applicable NFPA Codes of record, the licensing basis, and have sufficient capability and effectiveness to satisfy the FPP performance requirements of NFPA 805”.	Recommend changing wording to ‘to the approved fire protection program as modified by the NFPA 805 change process.’
*01.01.d	Compensatory measures in place for out-of-service, degraded or inoperable fire protection and nuclear safety equipment, systems or features provide reasonable assurance that the necessary function is compensated for	Correctly quote 1.6.8: Add, “or an act to mitigate the consequence of a fire” after necessary function.
*01.01.e	“Nuclear safety capability, as determined by one success path necessary to achieve the nuclear safety performance criteria is free of fire damage by a single fire...” This does not recognize that “free from fire damage” can be performance based.	This section should be clarified. If the Fire Risk Evaluation meets the acceptance criteria, this is confirmation that a success path effectively remains free of fire damage and that the performance-based approach is acceptable per Section 4.2.4.2 of NFPA 805.
*01.01.f	“Recovery actions to achieve the nuclear safety performance criteria of NFPA 805 are feasible and reliable.” This should be cross-referenced to appropriate guidance documents (NEI 04-02 as modified by FAQ 07-0030).	This should not be a separate criterion. It is part of Nuclear Safety Capability.

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01.01.g	Combustible control and hot work are already covered in 01.01.a. Also these sections should be broken down to reflect the regulation.	See suggested revision to structure of procedure.
01.01.g	We would expect to see each of these objectives detailed in the subsequent sections of the procedure. They are not.	Provide appropriate guidance in subsequent sections.
*01.01.h	Procedure does not reflect guidance provided in FAQ 09-0056 regarding acute releases.	Revise procedure to reflect FAQ guidance.
02.01(a)	If available select one fire area that is performance based, one fire area that is deterministic base, and one fire area that has a primary control station.	Revise wording as follows If available select one fire area that utilizes NFPA 805 Section 4.2.3, one fire area that utilizes NFPA 805 Section 4.2.4 and one fire area that utilizes a primary control station.
02.01(a)	<p>Procedure states "...Where plant changes have been made that could impact the plant's capability to meet the nuclear safety and radioactive release performance criteria, the inspection team should consider reviewing the licensee's change evaluation process in addition to a selection of recently implemented plant change evaluations that have been performed in the fire areas selected for inspection to verify these changes have been evaluated and incorporated in the fire protection program.</p> <p>The plant change process was reviewed and approved in the SE. Change wording to reflect that the inspection is focused on implementation and maintenance of the program.</p>	Change 'in addition to' to 'in conjunction with'.
*02.01(a) and 02.02(m)	Monitoring discussion should be revised to reflect FAQ 10-0059.	Incorporate FAQ 10-0059 when approved.
02.01(a)	The procedure states: "Verify that licensee risk-informed, performance-based alternatives to the requirements of NFPA 805 are approved by a Safety Evaluation Report in accordance with 10 CFR 50.48(c)(2)(vii)"	If the intent was to review 10 CFR 50.48(c)(2)(vii) performance based methods related to Chapter 3

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	Suggest that this sentence should be moved to the discussion on Plant Change evaluations.	
	Risk-informed or performance-based alternative to the requirements of NFPA 805 are in 10 CFR 50.48(c)(4).	
*02.01(a) numbered list	Remove the reference to RIS 2004-03. It is an outdated reference for NFPA 805 licensee.	Delete reference.
02.01(a)1	Differentiate between capability and compliance.	Clarify the terms.
*02.02	Under an NFPA 805 SE there will be no SER, exemptions or deviations, rather simply the approved FP program under the SE is the applicable licensing basis.	Remove all references to SER, Exemptions, Deviations
*02.02(a)	Protection of Safe Shutdown Capabilities is not the correct NFPA 805 terminology.	Revise all instances of SSA/SSD, etc to NSCA.
*02.02(a)	Radioactive release criteria' does not have a tie to 'success path'.	Revise all instances of SSA/SSD, etc to NSCA. Radioactive Release is section 4.3 of NFPA 805. Section (k) addresses radioactive release. Remove reference from this section
02.02(a)	Recovery actions are not the only reason a fire area utilizes the performance-based approach.	Revise this section to be more consistent with the overall approach of the NSCA (start big – work your way down to the details)
02.02(a)	Sections 02.02.e,f, g, h, i and l are all subpart of the NSCA analysis.	Suggest combining all NSCA related topics in one section.
02.02(a)	Same discussion applies to the sections on recovery actions (emergency lighting, communications, primary control station)	Suggest combining all NSCA related topics in one section.
*02.02(b)	Need consistent terminology for Electrical Raceway Fire Barrier Systems (ie. wrap, enclosure, etc. used)	Make terminology consistent throughout document.
*02.02.e	"Shutdown From a Primary Control Station" – the way Primary Control Station is used throughout is that this is the Remote or Alternate Shutdown Panel(s) (ACP and ATPs at HNP.) This is not consistent with Regulatory Guide 1.205 which shows the Main	Align terminology with regulation.

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	Control Room and the Dedicated Shutdown Panels.	
*02.02.e	“Verify that safe and stable conditions can be achieved and maintained from the primary control station with or without the availability of off-site power.” I do not see anything in NFPA 805 for verification of with or without off-site power for alternate or remote shutdown. Does not impact how we did the evaluation.	Align with regulation.
02.02(e)1	Same as comment for 02.02(a)	
*02.02(f)	Section points to NEI 00-01 Rev 2, however the approved approach for the plant would be that approved under the LAR/TR and described in detail in the LAR/TR Table B-2. Note: The approved FAQ 07-0038 refers to NEI00-01 Revision 1.	Appropriate reference is to NEI 00-01, Rev. 1.
02.02(g)	If specific issues arise relating to alternative or dedicated shutdown communications adequacy, then, observe a licensee conducted communications test in the subject plant area or areas. Who determines adequacy, acceptance criteria and this maybe a Special Test or Evolution and not readily completed during the limited inspection duration.	Consider providing more objective criteria.
02.02(i)	Is this applicable only when cold shutdown is the safe and stable condition?	Need clarity between safe and stable and end point. Align with FAQ 08-0054.
02.02.k	“Verify that the licensee analysis for radioactive release has been examined on a fire area basis (See NFPA 805 Section 2.2.4).” This verification would be done as part of approving the submittal and issuance of the SE.	Consider deleting since this should have been verified in the process for issuance of the SE to the licensee.
02.02(n)	There is insufficient detail in the inspection and review criteria for the Plant Change Evaluation process. This is the key element of NFPA 805 in terms of self-approval and the application of risk-informed and performance-based insights and methods.	Revise to provide more objective criteria.

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	The industry should engage the staff to assist in developing a better defined methodology (i.e., metrics and performance monitoring criteria) for inspection and assessments.	
*03.01(a)3	"... and cable required to ensure plant safety." Should read "... required to achieve the performance criteria of NFPA 805."	Revise with the NFPA 805 language.
*03.01(b)3	HNP was licensed to NEI 04-02 Rev1. It may be more appropriate to point to the plant's current license basis as documented in the LAR/TR and the SE.	Provide multiple references or revised to a more generic statement referencing the CLB.
*03.01(c)3c	Post transition there will be no G.L. 86-10 evaluations, only Engineering Equivalency Evaluations. Recommend using the current terminology to maintain consistency.	Revise with NFPA 805 language.
*03.01(c)3e	Should section refer to 10 CFR 50.48 (c)?	Confirm that correct section of 10CFR10.48 is referenced.
*03.04	"03.04 Identification and Resolution of Problems. Review a sample of corrective action documents detailing problems affecting fire protection or safe shutdown capability. For licensees that received enforcement discretion for circuit protection issues, verify that applicable problems were identified and entered into the corrective action program and addressed as described in the applicable enforcement guidance memorandum." Is this intended to be forever?	Remove the reference to the Non-805 transitioning stations.
*References	NEI 00-01, Revision 1 is the appropriate reference for NFPA 805 stations.	Review all references to ensure applicability to NFPA 805.