



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

May 26, 2011

LICENSEE: Licensees Planning to Transition to NFPA 805

FACILITY: Facilities Planning to Transition to NFPA 805

SUBJECT: SUMMARY OF MAY 11, 2011, MEETING WITH THE NUCLEAR ENERGY INSTITUTE, INDUSTRY REPRESENTATIVES, AND LICENSEES ON TRANSITIONING TO NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805

On May 11, 2011, a Category 2 public meeting was held between the 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. A list of attendees is provided as Enclosure 1.

SECY-11-0033, "Proposed NRC Staff Approach to Address Resource Challenges Associated With Reviews of a Large Number of NFPA 805 License Amendment Requests," dated March 4, 2011, described how a significant number of NFPA 805 license amendment requests were expected to be submitted in late June 2011 and the associated resource limitations of the NRC staff to perform these reviews in a timely manner. In the SECY, the staff described how an increase in resources and staggering, or sequencing the submittals over time would be advantageous to both the staff and industry.

On April 20, 2011, SRM-SECY-11-0033 was issued providing Commission approval with comments. Included in the Staff Requirements Memorandum (SRM) was direction for the NRC staff to provide a Commission paper addressing potential options for a proposed revision to the NFPA 805 Interim Enforcement Policy for Commission approval by April 29, 2011. Accordingly on April 29, 2011, the staff submitted SECY-11-0061, "A Request to Revise the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(C) to Allow Licensees to Submit License Amendment Requests in a Staggered Approach (RIN 3150-AG48)."

During the public meeting held on April 14, 2011, industry representatives discussed how staggering NFPA 805 submittals might be accomplished. While SECY-11-0061 on extending enforcement discretion had not been publicly released prior to the meeting of May 11, 2011, the NRC staff sought industry recommendations on plant-specific submittal dates representing a staggered approach consistent with staff resources. While Commission policy on a revised Interim Enforcement Policy had not been established, the staff sought this information for long-term planning purposes. The staff clearly stated that proposed submittal dates made during this meeting did not represent licensee commitments and only represented a "what if" scenario.

Licensee representatives announced their proposed NFPA 805 submittal dates. This information was recorded by the NRC staff and is shown as Enclosure 2. The staff stated that plants planning to submit in 2011 are expected to provide complete license amendment requests without the need for supplemental submittals. The staff further stated that the 2011 plant submittals are expected to have a 2-year review. The staff hopes to gain efficiency and

gradually reduce the review time down to 1 year for the final reviews. Finally, the staff recommended that plants submitting their NFPA 805 packages beyond 2011 should plan on holding a pre-submittal meeting with the staff. The staff has been conducting such meetings and finds them very useful in understanding the submittals in advance.

The NRC staff agreed to provide feedback to the proposed submittal dates of Enclosure 2 during a public meeting that was subsequently held via telephone conference call on May 18, 2011. Enclosure 3, "NFPA 805 Staggered Approach Submittal Consideration," was used by the staff to evaluate the proposed submittal dates.

A number of anticipatory questions were raised that cannot be fully answered until Commission policy is established. Some of the questions and comments were as follows:

- Despite the projected submittal dates provided today, would the staff accept earlier submittals? The staff indicated it would need to assess available resources.
- Clarification was sought regarding the SRM-SECY-11-0033 statement of "Until such time as the Commission's decision on the revisions to the Enforcement Policy is enshrined in a resultant Staff Requirements Memorandum, the current enforcement discretion should be extended." The staff indicated that until the Enforcement Policy is revised, the current enforcement discretion would be extended beyond June 29, 2011.
- Some plant-specific submittal dates may be modified dependent on the final SRM on the revised Interim Enforcement Policy.
- Once the SRM on the revised Interim Enforcement Policy is released, licensees would be expected to submit commitment letters indicating their planned NFPA 805 submittal date.

Members of the public were in attendance. Public Meeting Feedback forms were not received.

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: May 11, 2011 Location: Commissioner's Conference Room, Rockville, MD

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NAME	ORGANIZATION
Bob NAJUCH	First Energy Davis-Besse
FRANCY MANTINE	FIRST ENERGY Beaver Valley
Jana Bergman	sciencetech
Bill Veder	NPPD
Vincent Rubano	NextEra Energy
Amy Hazloff	ENERCON (Xcel Energy)
Henry Heggar	FIRST ENERGY
Tom Basso	NEI
Larry Parker	STARS
Liz Kleinsarg	KERS
Michael Towner	Dominion Resources
Ron Thomas	Dominion
Pablo Guardado	Entergy
David Goforth	Duke
JEFF ERTMAN	PE
Peter Mazzaferro	Constellation Energy
Terry Dorier	NRC/NRR/DRA/APLA
TOM STEVENS	Cooper Station - NPPD
LARRY NICHOLSON	nextera
Charles Moulton	NRC/NRR/DRA
Mike Cheok	NRC/NRR/DRA

PROPOSED SUBMITTAL DATES FOR NON-PILOT LICENSEES

NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805

MAY 11, 2011

FY-2011	FY-2012	FY-2013	FY-2014
Waterford	Crystal River(March)	McGuire	Davis-Besse
Duane Arnold (Sept)	Brunswick (Sept-Aug)	Catawba	
Callaway (July-Aug)	ANO – Unit 1	Robinson	
D.C. Cook (June)	ANO – Unit 2	Palisades	
Diablo Canyon (June)*	Turkey Point (June)	St. Lucie	
V.C. Summer (Sept)	Nine Mile Point Unit 1	Point Beach	
Ft. Calhoun (June)	Cooper (April)	Ginna	
Kewaunee (July)	Beaver Valley	Calvert Cliffs	
	Prairie Island (June)	San Onofre	
	Farley(March)		
	Browns Ferry (March)		
	Oconee (Supplement) (4 th Quarter)		

*The representative for Diablo Canyon stated this date was tentative pending the final SRM on extending enforcement discretion.

NFPA 805 STAGGERED APPROACH SUBMITTAL CONSIDERATIONS

- LIC-109 Acceptance Review
 - Completeness
 - Fire Risk Evaluations (FREs) Complete
 - Final Modification Configuration
- Safety Benefit(s)
- Fire PRA issues
 - Unreviewed Methods
 - Peer reviews & F&Os dispositioned
(both internal & external)
- Fleet Approach

gradually reduce the review time down to 1 year for the final reviews. Finally, the staff recommended that plants submitting their NFPA 805 packages beyond 2011 should plan on holding a pre-submittal meeting with the staff. The staff has been conducting such meetings and finds them very useful in understanding the submittals in advance.

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/ra/

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ADAMS Accession Nos. PKG ML111430767

Meeting Notice ML11160115 Meeting Summary ML111430783 Handout ML111290503

OFFICE	LPL1-1/PM	LPL1-1/LA	AFPB/BC	LPL1-1/BC
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DATE	05 / 26 / 11	05 / 24 / 11	05 / 25 / 11	05 / 26 / 11

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