

June 15, 2012

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

FROM: Charles E. Moulton, Fire Protection Engineer */RA/*  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 24, 2012, CATEGORY 1 MEETING  
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION  
STANDARD 805: NUCLEAR REGULATORY COMMISSION/NUCLEAR  
ENERGY INSTITUTE MANAGEMENT DISCUSSION

On May 24, 2012, the U.S. Nuclear Regulatory Commission (NRC) Division of Risk Assessment (DRA) management held a meeting with Nuclear Energy Institute (NEI) management to discuss questions requiring management attention related to National Fire Protection Association (NFPA) Standard 805.

The participants discussed, at a high level, the following topics:

- Review efficiencies
  1. The NRC stated that the audits the staff is performing is aiding their reviews. The NRC urged licensees to have all their cognizant staff available to support their audit, and take ownership of their programs.
  2. The NRC noted that some licensees will have second audits, which are focused on specific technical issues, on an as-needed basis.
  3. Pre-application meetings between licensees and the NRC staff aid the reviews. The NRC continues to encourage licensees to arrange these meetings. Licensees should expect to discuss unique aspects of their application and their submittal schedule at the meeting.
- Challenges
  1. No specific impacts due to the Fukushima event have been identified, but NEI expects them to develop. The NRC urged NEI to provide examples, if available.
  2. NEI expressed concern about probabilistic risk assessment (PRA) quality stability and the resolution of unreviewed analysis methods (UAMs).
    - The NRC stated that responses would be provided regarding the four UAMs that have been processed by the industry panel.
    - The NRC stated that no updates have been received from the industry UAM panel for some time. NEI agreed to look into the status of the panel.

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- NEI agreed to provide a list of outstanding UAMs and also prioritize the list.
- Both sides agreed that there is disagreement regarding the acceptability of the UAM methods.
- NEI expressed confusion concerning the process of achieving closure of UAMs.
- Participants agreed that the UAM issue would be a separate agenda item at future meetings.

The NRC noted that the agenda for a meeting of the PRA subcommittee of the Advisory Committee on Reactor Safeguards (ACRS) is being developed for the July meeting. Presenters at the meeting will include: the NRC staff, NEI, the Owners' Groups, and licensees. The NRC stated that the subcommittee is interested in hearing about the status of reviews and any technical issues that are being resolved.

The participants agreed that the next meeting would take place on June 28, 2012.

There were no handouts for the meeting.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:  
As stated

- o NEI agreed to provide a list of outstanding UAMs and also prioritize the list.
- o Both sides agreed that there is disagreement regarding the acceptability of the UAM methods.
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**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805  
FREQUENTLY ASKED QUESTIONS PROCESS  
LIST OF ATTENDEES**

May 24, 2012

**U. S. Nuclear Regulatory Commission Staff**

A. Klein  
A. Pearson  
C. Moulton  
H. Barrett  
J. Giitter  
L. Fields  
P. Lain  
S. Dinsmore  
S. Lee

**Stakeholders**

A. Ratchford (Kleinsorg Group)  
B. Simril (TVA)  
E. Kleinsorg (Kleinsorg Group)  
J. Butler (NEI)  
J. McQuighan (Constellation)  
M. Fletcher (AmerenUE)  
M. Lilley (Constellation)  
P. Mazzaferro (Constellation)  
T. Maness (NEI)  
V. Anderson (NEI)  
V. Rubano (FPL)