

June 29, 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 2 MEETING
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805: GENERIC QUESTIONS FROM EARLY LICENSE
AMENDMENT REQUEST REVIEWS

On May 24, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with Nuclear Energy Institute (NEI) representatives, other industry stakeholders, and the public to discuss generic questions arising from the NRC staff's reviews of the License Amendment Requests (LARs) for plants that are adopting National Fire Protection Association Standard 805 (NFPA 805).

To open the meeting, the NRC staff asked the stakeholders for ideas to improve communication with respect to generic issues, but no new ideas were identified. The participants agreed that discussions regarding process improvements should continue at the periodic recurring public meetings related to NFPA 805.

The NRC staff made a presentation regarding the process of developing Requests for Additional Information (RAIs) for a LAR. The presentation described the roles of the technical reviewers and their managers in the RAI development process, and the effect that the site audits play in the development of the final RAIs. The staff identified three different ways for an RAI to become generic:

- The same Issue being identified in different LARs.
- The same issue identified during different site audits.
- An issue identified in later LARs that applies to earlier LARs that are still under review.

The NRC staff made a presentation regarding the expectations when a Probabilistic Risk Assessment (PRA) application differs from the base-case methods described in NUREG/CR-6850 "EPRI/NRC-RES Fire PRA Methodology for Nuclear Power Facilities," or other NRC-approved methods. The staff stated that the identification of these differences is to ensure explicit review and determination of acceptability of these alternate methods. NEI representatives stated that a successful peer review of a licensee's PRA should be sufficient to

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demonstrate the acceptability of these methods. The NRC staff stated disagreement with this position. The NEI representatives stated that the current NRC guidance, such as Regulatory Guides and the Standard Review Plan, lack clarity on this subject. The NRC staff agreed to consider improvements to the NRC's regulatory guidance.

NEI representatives made a presentation regarding a proposed process to resolve generic RAs. The representatives expressed concern over the perceived growth in the number of generic questions, the perceived lack of regulatory stability, and over the prospect that these generic questions would become part of the NRC's acceptance review process for NFPA 805 LARs. The proposed process would involve:

1. Discussing these issues during the current NFPA 805 Frequently Asked Question (FAQ) process monthly public meetings;
2. Documenting issue resolution in the meeting summaries;
3. Using the current FAQ process for selected major issues; and
4. Using the current NFPA 805 NRC/NEI management discussion monthly public meetings to monitor the resolution process.

The participants agreed that an agenda item would be added to the next FAQ meeting notice for discussion of generic questions. Participants also agreed that discussion of specific examples of generic issues and proposed solutions would take place at a previously scheduled public meeting at NRC headquarters on June 27, 2012.

The meeting handouts are available in the Agencywide Documents Access and Management System. The NRC presentation slides are available at ML121440447. The NEI presentation slides are available at ML121450015.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

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5. Discussing these issues during the current NFPA 805 Frequently Asked Question (FAQ) process monthly public meetings;
6. Documenting issue resolution in the meeting summaries;
7. Using the current FAQ process for selected major issues; and
8. Using the current NFPA 805 NRC/NEI management discussion monthly public meetings to monitor the resolution process.

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**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
GENERIC QUESTIONS FROM EARLY LICENSE AMENDMENT REQUEST REVIEWS
LIST OF ATTENDEES**

May 24, 2012

U. S. Nuclear Regulatory Commission Staff

A. Klein
A. Pearson
C. Moulton
D. Harrison
F. Saba
H. Barrett
L. Fields
P. Lain
S. Dinsmore
S. Laur
S. Lee

Stakeholders

A. Driver (Duke)
A. Holder (Progress)
A. Ratchford (Kleinsorg Group)
B. Simril (TVA)
B. Van Sant (OPPD)
D. MacDougall (AEP)
E. Kleinsorg (Kleinsorg Group)
J. Butler (NEI)
J. Gregerson (Tri-en Corp)
J. McQuighan (Constellation)
K. Zee (ERIN)
M. Fletcher (AmerenUE)
M. Lilley (Constellation)
P. Boulden (Appendix R Solutions)
P. Mazzaferro (Constellation)
P. Ouellette (EPM)
R. Dukes (ENERCON)
R. Nazario (Entergy)
R. Summitt (RSC)
R. Wachowiak (EPRI)
T. Jutras (EPM)
T. Maness (NEI)
T. Shudak (NPPD)
V. Anderson (NEI)
V. Rubano (FPL)