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~~Sensitive Information. Withhold from public disclosure per 10 CFR 2.390. Decontrolled upon removal of Attachments C, D, G, S, and W from Enclosure 1.~~



September 25, 2012

Docket Nos.: 50-348
50-364

NL-12-1893

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant
License Amendment Request to Adopt NFPA-805 Performance Based Standard
for Fire Protection for Light Water Reactor Electric
Generating Plants (2001 Edition)

Ladies and Gentlemen:

In accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend Renewed Facility Operating License No. NPF-2 for Joseph M. Farley Nuclear Plant (FNP) Unit 1 and FNP Unit 2 Renewed Facility Operating License No. NPF-8. This License Amendment Request (LAR) requests the Nuclear Regulatory Commission (NRC) review and approval for adoption of a new fire protection licensing basis which complies with the requirements in 10 CFR 50.48(a), 10 CFR 50.48(c), and the guidance in Regulatory Guide (RG) 1.205, Revision 1.

Enclosure 1 to this letter contains the FNP NFPA 805 LAR (Transition Report). SNC considers Attachments C, D, G, S, and W to Enclosure 1 to be sensitive information and requests that it be withheld from public disclosure pursuant to 10 CFR 2.390. A redacted version is provided as Enclosure 2. In an effort to clarify the FNP approach to NRC concerns with previous LAR submittals that may have FNP applicability, Enclosure 3 provides a table to address each of the "Generic RAIs" identified by the Nuclear Energy Institute (NEI) NFPA 805 Task Force.

This letter contains no NRC commitments. As part of the activities associated with the transition to NFPA 805, FNP shall implement the necessary modifications to complete the transition to full compliance with 10 CFR 50.48(c). A list of modifications and a schedule for completion is provided in LAR (Transition Report) Attachment S. Implementation of new NFPA 805 fire protection program shall include procedure changes, process updates, and training to affected plant personnel. This will be completed 180 days after NRC approval.

A006
NRR

If you have any questions, please contact Mr. Ken McElroy at (205) 992-7369.

Mr. Ajluni states he is Nuclear Licensing Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Sworn to and subscribed before me this 25th day of September, 2012.


Notary Public

My commission expires: 11-2-2013

Respectfully submitted,


M. J. Ajluni
Nuclear Licensing Director

MJA/GAL/lac

Enclosures: 1. NFWA 805 LAR Transition Report
2. NFWA 805 LAR Transition Report (Redacted Version)
3. Generic RAIs

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. T. A. Lynch, Vice President – Farley
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Fleet Operations
RTYPE: CFA04.054

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Project Manager – Farley
Mr. E. L. Crowe, Senior Resident Inspector – Farley

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

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License Amendment Request to Adopt NFPA-805 Performance Based
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Enclosure 3

Generic RAIs

Generic RAIs – Southern FNP Comparison

No.	Topic-Generic Issue	Actions / Disposition	Ref.	Status/Comment	FNP Disposition
1	Monitoring Program (ML113210461 - Slide 11) – Closure of FAQ 59 is necessary and clarification on use of maintenance rule	FAQ 59 will address this topic.	11/18/11 Meeting ML113210461 ML113340218 ML120750108	Added additional information added to Section 4.6 in LAR Template (Rev. 1N). Mirrors RAI responses for Callaway and DAEC FAQ 59, Rev. 5 sent to NRC 02/10/12. Technical agreement reached on 2/16/12. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP will create a NFPA 805 Monitoring Program similar to the Maintenance Rule for HSS Fire Protection Features and Systems. It will be documented in the NFPA 805 Monitoring Program Engineering Evaluation to be developed during Implementation.
2	Seismic standpipes/Hose Stations (ML113210461 -Slide 12) – The NRC wants additional information on the ability to fight fires following an earthquake.	Additional dialogue with the NRC is needed on this topic.	11/18/11 Meeting ML113210461 ML113340218	The exception to Section 3.6.4 is not endorsed. The NRC is asking licensees without seismic hose stations to discuss how they would fight a fire in the event of a seismic event. This seems to be in conflict with Section III. Comment Resolution on Proposed Rule in the Federal Register. Discussed at 4/26/12 FAQ meeting. This topic will be eliminated as a generic RAI and plant specific RAIs will be “pulled back” based on NRC discussion with legal staff. ML121370055 Discussed at the 5/24/12 FAQ meeting. LAR template note will suggest that licensees’ (operating plants and plants with construction permits issued prior to July 1, 1976 with non-seismic standpipes and hose stations previously approved in accordance with Appendix A to BTP APCSB 9.5–1) utilize “complies via previous approval” for this Section of NPFA 805. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP LAR Attachment A, Section 3.6.4 includes the resolution deemed acceptable by the NRC.

Generic RAIs – Southern FNP Comparison

No.	Topic-Generic Issue	Actions / Disposition	Ref.	Status/Comment	FNP Disposition
3	Total CDF/LERF (ML113210461-Slide 13) –NRC indicated that the last sentence on Slide 13 was incorrect and the CDF and LERF values should be E-06 and E-07, respectively.	Guidance on this topic is already in the LAR template (Rev. 1k), Section W.2	11/18/11 Meeting ML113210461 ML113340218	Added “Note to LAR Developer” in Att. W. No technical change made to LAR Template (Rev. 1L). Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP LAR Attachment W, Table W-1 provides the summary of total plant risk (total CDF and LERF) including other external events reported.
4	FSAR (ML113210461-Slide 14) – Industry expressed concern that the NRC had changed their mind on this topic and is requesting information that previously had been identified as not necessary. NRC acknowledged the change in direction and referred to guidance in RG 1.174 and SRP 19.2 as some of the rationale for desiring information on FSAR content	Make FSAR content an attachment in NEI 04-02, Rev. 3, rather than part of the LAR. NRC desires general information, not an FSAR markup or detailed information.	11/18/11 Meeting ML113210461 ML113340218	This topic is not being handled consistently between the transitioning plants. Is there a need to treat this as a generic topic. Change made to LAR Template (Rev. 1L) Section 5.4 (Section 5.4 Transition Schedule renumbered to Section 5.5). Added “Note to LAR Developer” FAQ 12-0062 received technical agreement at FAQ meeting 5/24/12. Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP LAR Section 5.2 includes FSAR discussion. Reference to FAQ 62 is made in the LAR with respect to FSAR content and format.
5	Defense-in-Depth/Safety Margin (ML113210461-Slide 15)– The NRC expressed concern that guidance on the process simply referred to NEI 04-02, rather than describing the process in the LAR. They indicated that they do not want detailed information by Fire Area.	LAR Template Section 4.5.2.2 to include additional information from FAQ 54 to address this concern	11/18/11 Meeting ML113210461 ML113340218	Change made to LAR Template (Rev. 1L) Section 4.5.2.2. Additional discussion with the NRC is needed to determine closure method. NRC to review LAR template discussion.	There is still uncertainty on the level of detail the NRC is expecting. FNP LAR Section 4.5.2.2 is enhanced with discussion of defense in depth. Additional details are provided in the Fire Risk Evaluation (FRE) report, consistent with LAR template Rev. 1N.

Generic RAIs – Southern FNP Comparison

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6	Fire PRA Quality (ML113210461-Slide 16) – Inconsistent use of terms was the main concern (focused scope peer review, gap assessment, etc.)	The NFPA 805 TF will work with the Fire PRA TF to clarify terminology and update the LAR template, as necessary (Att. U, V).	11/18/11 Meeting ML113210461 ML113340218	Added “Note to LAR Developer” to Tables U-1 and V-1 that discusses closure of F&Os, treatment of suggestion F&Os, and adequate documentation of F&O resolution. Need to add the NEI guidance that provides guidance for these terms. NEI to look at terms for Fire PRA quality.	FNP LAR Section U and V writers confirmed consistent terminology and content of these sections meet anticipated NRC expectations.
7	Post-Transition Change Process (ML113210461-Slide 17) – The NRC wants to know more on site specific implementation. The industry expressed concern about being able to provide a lot of specifics with the LAR submittal. The NRC indicated that some level of detail on which site specific processes and procedures would be modified would need to be provided in the LAR	Guidance about this is provided in the LAR template (Rev. 1k) Section 4.7.2. FAQ 61 (under development) will help address this topic.	11/18/11 Meeting ML113210461 ML113340218	Added “Note to LAR Developer” in Section 4.7.2 of LAR Template (Rev. 1L) and referred to an example (utility response dated 9/27/10 and 8/13/2009). Task Force considers this issue closed. NRC to review LAR template discussion.	FNP LAR Section 4.7.2 is consistent with the Generic Template and other industry submittals. Industry questions the generic nature of this RAI as it showed up only at one utility and the industry responses are very similar. FAQ 61 is under NRC review.
8	Non-Power Operations (ML113210461-Slide 18) – The NRC wants more detailed information in the LAR on pre-fire actions to prevent spurious operation (e.g., removal of power to component) and recovery actions.	The TF will update the LAR template (Section 4.3.2, Att. D) to address this topic, rather than trying to revise FAQ 40.	11/18/11 Meeting ML113210461 ML113340218	Added “Note to LAR Developer” in Attachment D of LAR Template (Rev. 1L). Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP LAR Attachment D includes the statement “No pre-fire actions or recovery actions were credited in developing the pinch point tables.”
9	B-2 Table (ML113210461-Slide 19) – The concern was that B-2 table statements should reference how the post-transition program meets the guidance, and not reference Appendix R or superseded documents.	The TF will review and see if additional guidance is needed in LAR template (Section 4.2.1, Att. B).	11/18/11 Meeting ML113210461 ML113340218	No change to LAR Template (Rev. 1L) Task Force to monitor to see if additional guidance is warranted.	FNP LAR Attachment 2 - Table B-2 (when completed) will be reviewed to ensure no reference to Appendix R is made.

Generic RAIs – Southern FNP Comparison

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10	NEI 00-01 Rev. 2 (ML113210461-Slide 20) – Although FAQ 39 endorsed Rev. 1 of NEI 00-01 Chapter 3 in the B-2 table, the NRC referenced Rev. 2 of NEI 00-01 in RG 1.205 Rev. 1. The NRC would like a gap analysis of Rev. 2 vs. Rev. 1 of NEI 00-01 and a discussion of the gap analysis and results in the LAR submittal.	The NRC would like a gap analysis of Rev. 2 vs. Rev. 1 of NEI 00-01 and a discussion of the gap analysis and results in the LAR submittal (Section 4.2.1, Att. B)..	11/18/11 Meeting ML113210461 ML113340218	Added additional discussion and “Note to LAR Developer” to LAR Template (Rev. 1L) Section 4.2.1.1. Task Force developed a list of the ‘substantive change topics’ Task Force considers this issue closed. NRC agreed this issue closed 6/28/12.	FNP LAR Section 4.2.1.1 includes discussion on the additional review performed to NEI 00-01 Revision 2.
11	Safe and Stable (ML113210461-Slide 21) – The NRC would like a justification (qualitative risk analysis) if a defined time period is specified.	Guidance on this topic is already available in FAQ 54 and in the LAR template. (Section 4.2.1.2)	11/18/11 Meeting ML113210461 ML113340218	No change to LAR Template (Rev. 1L) Additional reviews indicate that the NRC may desire a qualitative risk analysis even if a defined time period is not specified. NEI will clarify in template that qualitative risk analysis should be provided whether or not a defined time period is provided in safe and stable definition.	FNP LAR Section 4.2.1.2 does not include a defined time period. FNP does not include a statement on qualitative risk analysis. It is not clear exactly what the NRC expectations are. FNP is consistent with other recent submittals. This item is not deemed to be a LIC 109 risk, but has potential for an RAI.
12	Complies with Clarification (ML113210461-Slide 22) – This concern was referencing an incorrect compliance statement.	It was believed that sufficient guidance exists on this topic.	11/18/11 Meeting ML113210461 ML113340218	No change made to LAR Template (Rev. 1L). Task Force to monitor to see if additional guidance is warranted.	FNP LAR Attachment A uses the “Complies with Clarification” compliance statement twice. Each case is used appropriately.
13	Redaction of Security Related Information (ML113210461-Slide 27)	NEI-NRC to work on approach	11/18/11 Meeting ML113210461 ML113340218	Not characterized as “Generic RAI” at 11/18/11 meeting. No change made to LAR Template (Rev. 1L). Discussed 6/27 – 6/28/12. NEI to revise template to remove redactions of entire statement and reference guidance from NRC (with decision on specifics ultimately left to individual plant processes).	LAR redaction will be done by FNP licensing at their discretion.

Generic RAIs – Southern FNP Comparison

No.	Topic-Generic Issue	Actions / Disposition	Ref.	Status/Comment	FNP Disposition
14	Treatment of FPRA Unreviewed Analysis Methods (UAMs) (ML113210461-Slide 61).	Industry needs clear understanding of how UAMs are treated and closed out.	11/18/11 Meeting ML113210461 ML113340218	Not characterized as "Generic RAI" at 11/18/11 meeting. No change made to LAR Template (Rev. 1L). Additional discussion with the NRC is needed to determine closure method.	FNP Fire PRA has not used any UAM; however, SNC has used methods which are not explicitly defined in NUREG/CR-6850. These methods are discussed in item 27.
15	NRC now asking for 10 CFR 50.48(c)(2)(vii) submittal for use of EPRI process for surveillance optimization uses. (two utilities)	Two utilities		New item discussed at 3/22/12 TF meeting. Need additional discussion with staff to determine path for closure. Industry working on generic response to this topic.	The FNP LAR did not address this generic RAI topic. This specific topic is still developing and under discussion with the NRC. Both pilot plants did not use this approach and received SE's. This item is not deemed to be a LIC 109 risk, but has the high potential for an RAI

Generic RAIs – Southern FNP Comparison

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16	<p>FPRA - Sensitivity study on CPT factor 2.</p> <p>It was recently stated at the industry fire forum that the Phenomena Identification and Ranking Table Panel being conducted for the circuit failure tests from the DESIREEFIRE and CAROL-FIRE tests may be eliminating the credit for Control Power Transformers (CPTs) (about a factor 2 reduction) currently allowed by Tables 10-1 and 10-3 of NUREG/CR-6850, Vol. 2, as being invalid when estimating circuit failure probabilities. Provide a sensitivity analysis that removes this CPT credit from the PRA and provide new results that show the impact of this potential change on CDF, LERF, ΔCDF, and ΔLERF. If the sensitivity analysis indicates that the change in risk acceptance guidelines would be exceeded after eliminating CPT credit, please justify not meeting the guidelines.</p>		<p>RAI's for several utilities and "generic" RAIs (#9)</p>	<p>New item discussed at 3/22/12 TF meeting.</p> <p>Need additional discussion with staff to determine path for closure.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p>	<p>FNP Fire PRA does a sensitivity analysis on all hot short probabilities by multiplying them by a factor of 2. The results from this sensitivity study are discussed in Att V of LAR.</p>
17	<p>Please describe how your evaluation includes the possible increase in heart (sic) release rate caused by the spread of a fire from the ignition source to other combustibles. Please summarize how suppression is included in your evaluation.</p>		<p>"generic" RAIs (#1)</p>	<p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p>	<p>The increase in total heat release rate due to intervening combustibles is considered in the Farley Fire PRA.</p>

Generic RAIs – Southern FNP Comparison

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18	<p>Transient fires should at a minimum be placed in locations within the plant PAUs where CCDPs are highest for that PAU, i.e., at “pinch points.” Pinch points include locations of redundant trains or the vicinity of other potentially risk-relevant equipment, including the cabling associated with each. Transient fires should be placed at all appropriate locations in a PAU where they can threaten pinch points. Hot work should be assumed to occur in locations where hot work is a possibility, even if improbable (but not impossible), keeping in mind the same philosophy.</p>		<p>“generic” RAIs (#2)</p>	<p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p>	<p>A transient fire is postulated in any location that it is plausible.</p> <p>Plausible in this context, based on plant specific physical features.</p> <p>FNP scenario report describes the transient scenario identification process.</p>
19	<p>Discuss the calculation of the frequencies of transient and hot work fires. Characterize your use of the influence factors for maintenance, occupancy, and storage, noting if the rating “3” is the most common, as it is intended to be representative of the “typical” weight for each influence factor.</p>		<p>“generic” RAIs (#3, 4)</p>	<p>This is addressed by SRs within the PRA Standard.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.</p> <p>FAQ 12-64 addresses this topic.</p>	<p>A discussion is provided in the Farley Plant Partitioning and Ignition Frequency Development report includes a discussion for influence factors used other than “3”.</p> <p>The assignments are based on insights from a plant review panel.</p>

Generic RAIs – Southern FNP Comparison

No.	Topic-Generic Issue	Actions / Disposition	Ref.	Status/Comment	FNP Disposition
20	Section 10 of NUREG/CR-6850 Supplement 1 states that a sensitivity analysis should be performed when using the fire ignition frequencies in the Supplement instead of the fire ignition frequencies provided in Table 6-1 of NUREG/CR-6850. Provide the sensitivity analysis of the impact on using the Supplement 1 frequencies instead of the Table 6-1 frequencies on CDF, LERF, Δ CDF, and Δ LERF for all of those bins that are characterized by an alpha that is less than or equal to one. If the sensitivity analysis indicates that the change in risk acceptance guidelines would be exceeded using the values in Table 6-1, please justify not meeting the guidelines.		“generic” RAIs (#7)	This is addressed by SRs within the PRA Standard. 6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.	This sensitivity study is presented in Att V of the LAR. Because SNC plans to reestablish baseline and delta risk estimates by replacing 2012 industry consensus electrical cabinet model with NURG/CR-6950 model, no additional work is performed to justify the results of the sensitivity study. Rather, the ignition frequency study will be revised concurrently with changes in baseline and delta risk estimates.
21	Please describe how CDF and LERF are estimated in main control room (MCR) abandonment scenarios. Do any fires outside of the MCR cause MCR abandonment because of loss of control and/or loss of control room habitability? Are “screening” values for post MCR abandonment used (e.g., conditional core damage probability of failure to successfully switch control to the Primary Control Station and achieve safe 3 shutdown of 0.1) or have detailed human error analyses been completed for this activity. Please justify any screening value used.		“generic” RAIs (#8)	This is addressed by SRs within the PRA Standard. 6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs.	Scenarios have been defined that cause MCR Abandonment. A range of screening values are used. The FRE report and the FNP Scenario report include additional information for MCR scenarios.

Generic RAIs – Southern FNP Comparison

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22	<p>Attachment W of the LAR provides the ..CDF and ..LERF for the variances from the deterministic requirements (VFDRs) for each of the fire areas, but the LAR does not describe either generically or specifically how ..CDF and ..LERF were calculated. Describe the method(s) used to determine the changes in risk reported in the Tables in Appendix W. The description should include:</p> <p>a) A summary of PRA model additions or modifications needed to determine the reported changes in risk. If any of these model additions used data or methods not included in the fire PRA Peer Review please describe the additions.</p> <p>b) Identification of new operator actions (not including post MCR abandonment which are addressed elsewhere) that have been credited in the change in risk estimates. If such actions are credited, how is instrument failure addressed in the HRA.</p>		“generic” RAIs (#10)	<p>This is a candidate for revision to LAR template.</p> <p>Added section to Attachment W.</p> <p>6/28/12 – Additional discussion needed on how to treat this Fire PRA topic (not necessarily as a LAR template item). NEI to work on how to treat Fire PRA topics likely to get extensive reviews/RAIs. NEI to look at existing guidance.</p>	<p>The methodology used for performing fire risk evaluations is discussed in Att W of the LAR.</p> <p>All of the methods utilized in the development of FNP Fire PRA have been peer reviewed.</p> <p>No new operator actions are credited in the change in risk estimates.</p>
23	<p>Did the peer reviews for both the internal events and fire PRAs consider the clarifications and qualifications from Regulatory Guide (RG) 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk- Informed Activities," March 2009 (ADAMS Accession No. ML09041 0014) to the ASME/AMS PRA Standard? If not, provide a self-assessment of the PRA model for the RG 1.200 clarifications and qualifications and indicate how any identified gaps were dispositioned.</p>		“generic” RAIs (#11)	<p>Added the following note to LAR Developer in Attachment U:</p> <p>Provide a general discussion of the standards against which the Internal Events PRA has been reviewed. Ensure that RG 1.200 Revision 2 has been considered.</p> <p>6/28/12 – NRC questioned RG 1.200 Rev. 2 for fire and asked to ensure guidance in LAR template addressed fire.</p>	<p>Both the FNP Fire and Internal Events PRAs have undergone a RG 1.200, Revision 2, Peer Review.</p>

Generic RAIs – Southern FNP Comparison

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24	Identify if any variance from deterministic requirement (VFDRs) in the LAR involved performance-based evaluations of wrapped or embedded cables. If applicable, describe how wrapped or embedded cables were modeled in the Fire PRA including assumptions and insights on how the PRA modeling of these cables contributes to the VFDR delta risk evaluations.		“generic” RAIs (#12)	See item 22	Not applicable. FNP does not have VFDRs related to embedded or wrapped cables.
25	Identify any plant modification (implementation item) in Attachment S of the LAR that have not been completed but which have been credited directly or indirectly in the change-in-risk estimates provided in Attachment W. When the affects of a plant modification has been included in the PRA before the modification has been completed, the models and values used in the PRA are necessarily estimates based on current plans. The as-built facility after the modification is completed may be different than the plans. Please add an implementation item that, upon completion of all PRA credited implementation items, verifies the validity of the reported change-in-risk. This item should include your plan of action should the as-built change-in-risk exceed the estimates reported in the LAR.		“generic” RAIs (#13)	<p>Added a note to LAR developer in Attachment S.</p> <p>The task force considers this issue closed. Task Force considers this issue closed. NRC to review LAR template discussion.</p>	<p>An implementation item is identified in Table S-3 of the LAR. This implementation item will adjust the FNP Fire PRA to reflect the as built plants after modifications have been implemented.</p> <p>Should the condition arise such that the as-built change-in-risk exceed estimates reported in the LAR, Corrective action would take place.</p>

Generic RAIs – Southern FNP Comparison

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26	<p>Please identify any changes made to the internal events or fire PRA since the last full scope peer review of each of these PRA models that are consistent with the definition of a "PRA upgrade" in ASME/ANS-RA-Sa-2009, as endorsed by Regulatory Guide 1.200. Also, please address the following:</p> <ul style="list-style-type: none"> <li data-bbox="243 492 680 844">i) If any changes are characterized as a PRA upgrade, please identify if a focused scope peer review was performed for these changes consistent with the guidance in ASME/ANS-RA-Sa-2009, as endorsed by Regulatory Guide 1.200, and describe any findings from that focused-scope peer review and the resolution of these findings for this application. <li data-bbox="243 852 680 1042">ii) If a focused-scope peer review has not been performed for changes characterized as a PRA upgrade, please describe what actions will be implemented to address this review deficiency. 		"generic" RAIs (#14)	<p>This is a candidate for revision to LAR template.</p> <p>6/28/12 – NEI to review for possible updates to LAR template.</p>	<p>There have been no changes to the internal events or Fire PRA model that would be considered a "PRA upgrade" since the last full scope Peer Review.</p>

Generic RAIs – Southern FNP Comparison

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27	During the 5/24/12 public meeting the NRC asked that the licensee identify deviations from NUREG/CR 6850 methods including those that involve justifications.	The staff has noticed that this has been treated inconsistently in the submittals.		This is addressed by SRs within the PRA Standard. Need additional discussion with staff to determine path for closure (i.e., the correct amount of information to be included in the LAR versus supporting documentation).	FNP Fire PRA has used one alternate analysis method (Panel Severity Factor) to NUREG/CR-6850 which is discussed in the FNP LAR Attachment V. This discussion includes the results from a sensitivity study. Although the sensitivity study yields results estimated delta CDF/LERF values around the acceptance criteria defined in RG 1.174, SNC intends to follow direction from the NRC staff to replace the 2012 industry consensus electrical cabinet model with the model prescribed by NUREG/CR-6850.
28	Clarification between IEEE-383 Flame Spread Rating and damage threshold		6/27/12 Public Meeting (Slide 8)	This is not necessarily a LAR template item, but a topic that should be understood by licensees in preparation of the LAR.	The FNP Scenario report discusses the types of cables installed in the plant and their damage threshold. This is discussed in terms of the damage threshold of thermoplastic and thermoset cables.

Generic RAIs – Southern FNP Comparison

No.	Topic-Generic Issue	Actions / Disposition	Ref.	Status/Comment	FNP Disposition
29	NFPA 805 Quality Section 2.7.3 – NRC concerns about future commitment to meet 2.7.3 (specific concerns over post transition qualifications)		6/27/12 Public Meeting (Slide 9)	Candidate for LAR template revision.	<p>FNP LAR Section 4.7.3 is consistent with the Generic Template and other LAR submittal with respect to the discussion of Quality requirements.</p> <p>This item is new and not officially on the NRC Generic RAI list at this time. No action taken to change LAR approach as NRC expectations are not entirely clear at this point. This item is still developing, therefore an RAI may be expected.</p>
30	Clarification needed on risk and delta risk criteria related to credit for modifications, additional risk of recovery actions		6/27/12 Public Meeting PRA Slides (Slide 5)	Need additional discussion with NRC on this topic. Candidate for LAR template revision after clarification obtained and agreed upon.	<p>Modifications were included in the analysis to decrease the cumulative total risk and the total delta risk to ensure that the acceptance criteria defined by RG 1.174 is met. The additional risk of recovery actions are included in Att W.</p>