

## Comment Disposition FAQ 12-0061 Rev. 0

No.	Comment	Response
1.	NRC General Comment 1- What do you propose to do about changes to methods and changes to the PRA? 50.59 addresses this type of change. 50.59(c)(1)(viii) prohibits, "Results in a departure from a method...". 50.59(a)(2) defines "Departure from a method..." to include all approved methods.	Changes in methods and changes to the fire PRA are addressed in Appendix J text.  The 50.59 process is not applicable to fire protection.
2.	NRC General Comment 2 - There seems to be no discussion on using 4.2.4.1 Fire Modeling as a change evaluation tool.	PROPOSED RESOLUTION – NEI was directed by the NRC in the development of Rev. 0 of NEI 04-02 (including feedback from the ACRS) that change evaluations must consider change in risk and not be solely based on fire modeling approach. (ML052270502)  Added the following to Section 5.3.1.3:  Fire modeling is integral to a risk-informed, performance-based fire protection program. During the licensee transition process, some licensees may have elected to use the fire modeling approach of Section 4.2.4.1 of NFPA 805 to establish the compliance basis for certain fire areas in the plant. While this is an acceptable compliance approach, the post-transition change evaluation process must include the consideration of change in risk, defense-in-depth, and safety margin. While the fire modeling tools may provide the most efficient means to assist in that determination of a change in risk (e.g., no target damage shown through fire modeling can be extrapolated to no/low change in risk), the acceptance criteria of a change evaluation must be in accordance Section 2.4.4 of NFPA 805.
3.	NRC General Comment 3 - There is a lot of repetition between 5 and Appendix J. Why repeat? If things are repeated they should be word for word since otherwise they can be construed to be acceptable alternatives. Can you read only (appendix J) to find everything or must you read both?	Removed a lot of duplication;
4.	NRC General Comment 4 - A number of processes (d-i-d, safety margins, and uncertainty) will have been developed and used in the transition phase and accepted by the NRC. These processes should be carried over into the post-transition phase but this document does not seem to emphasize that.	Included a reference on DID, safety margin, and uncertainty to the process used during transition
5.	NRC General Comment 5 - The cumulative change in risk in J.6.2 certainly seems to address this complex issue, but the current write-up seems to mix (changes in risk from a change) with (changes in risk following PRA updates). The proposal seems to be – new changes addressed as they are developed without addressing cumulative, cumulative is addressed	Yes, that is the intent.  Added some discussed in Section 5.3.1.3 to describe the proposed relationship between review of individual changes and review of PRA results following updates and addressing

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	during the periodic PRA updates based on changes in fire area risk.	cumulative risk.
6.	Page 2: Comment [eak1] ekleinsorg 9/5/2012 5:33:00 PM Fire PRA / PRA consistency Global	PROPOSED RESOLUTION: Reviewed and updated.
7.	Page 2: Comment [C2] cem4 7/17/2012 1:28:00 PM Align w/ 805 text.	Incorporated.
8.	Page 2: Comment [S3] scd1S 8/31/2012 2:04:00 PM Should point out that plant specific evaluations for these issues have been used to transition – and these same evaluations should be used after transition (unless changed – see general comment on changing methods)	PROPOSED RESOLUTION- Suggested text added for DID, SM, and uncertainty.
9.	Page 2: Comment [S4] scd1S 8/30/2012 11:50:00 AM These numbers are wrong. The self-approval numbers are a factor of 10 lower.	Incorporated. Removed bulleted item completely.
10.	Page 2: Comment [S5] scd1S 8/31/2012 2:05:00 PM This section does not refer to self-approval.	Incorporated. Removed bulleted item completely.
11.	Page 3: Comment [C6] cem4 8/31/2012 8:39:00 AM Why was the discussion of NFPA 805 section 1.7 removed from this section?	<p>A review of the origin of this statement determined that this verbiage was added prior to NEI 04-02, Rev. 0, in response to NRC questions. See 3/18/05 letter (ML050730430)</p> <p>“Industry raised the question regarding the delegation of limited AHJ approval authority to licensees with respect to the fundamental fire protection program design elements in Chapter 3 of NFPA 805. Based on additional investigations, we have concluded that the NRC cannot delegate this authority. However, to avoid numerous unnecessary LAR submittals for standard equivalences of little or no safety significance, the staff plans to develop guidelines during the Transition Pilot Program to clarify the types of changes that will require AHJ approval.”</p> <p>This information appears to be addressed by approval of FAQ 06-008 during the transition process. This statement no longer appears necessary in this section of NEI 04-02.</p>

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12.	Page 3: Comment [S7] scd1S 8/30/2012 11:50:00 AM These are similar but a little different from RG 1.205 text on page J-2. Identical descriptions should be avoided but, if unavoidable, should have identical text (and be right)	PROPOSED RESOLUTION – Based on discussion with NRC at 9/6/12 FAQ meeting, it would be ideal for NEI 04-02 to have acceptable language, and RG 1.205 would endorse NEI 04-02. This wording is believed to be more appropriate than the current language in RG 1.205 Rev. 1 Reg. Position 3.2.3.  Duplication w/ App. J is addressed in General Comment 3.
13.	Page 3: Comment [C8] cem4 7/17/2012 1:28:00 PM I am sure there are other items that would not be allowed self-approval.	Added qualifying sentence, since this is a high level introduction, rather than getting into the details provided later in the FAQ.
14.	Page 3: Comment [eak9] ekleinsorg 9/6/2012 9:15:00 AM NRC MEETING: Need to explain the need to add an etc.	PROPOSED RESOLUTION – Added qualifying sentence, since this is a high level introduction, rather than getting into the details provided later in the FAQ.
15.	Page 3: Comment [S10] scd1S 8/30/2012 11:50:00 AM Can fire modeling be used to determine no increase has occurred?	PROPOSED RESOLUTION – See response to NRC General Comment 2. Added discussion to Section 5.3.1.3.
16.	Page 3: Comment [eak11] ekleinsorg 9/6/2012 9:09:00 AM TF would like to understand how to use fire modeling without Risk metric	PROPOSED RESOLUTION – See response to NRC General Comment 2. Added discussion to Section 5.3.1.3.
17.	Page 3: Comment [eak12] ekleinsorg 9/6/2012 9:11:00 AM Need to add discussion on how a 4.2.4.1 plant would use the change evaluation process	PROPOSED RESOLUTION – See response to NRC General Comment 2. Added discussion to Section 5.3.1.3.
18.	Page 4: Comment [S13] scd1S 9/6/2012 9:11:00 AM What is "minimal"? Suggest the 50.59 language that if unclear that it is and increase or decrease, it is minimal. 10-7/yr is not a definition of minimal since quantitative risk results are compared to this value.	PROPOSED RESOLUTION – Additional discussion needed with the NRC on this topic.
19.	Page 4: Comment [eak14] ekleinsorg 9/6/2012 9:15:00 AM NRC MEETING: Need to flesh out minimal. Try to give example.	PROPOSED RESOLUTION – Additional discussion needed with the NRC on this topic.

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20.	Page 5: Comment [C15] cem4 8/31/2012 8:24:00 AM The staff notes that the “Is a license amendment required?” diamond is doing a lot of work here that should be more clearly explained.	PROPOSED RESOLUTION – Added additional discussion on this topic.
21.	Page 5: Comment [eak16] ekleinsorg 9/5/2012 5:31:00 PM Fletcher: simplify wording on ‘greater than minimal’	PROPOSED RESOLUTION – Additional discussion needed with the NRC on this topic.
22.	Page 5: Comment [eak17] ekleinsorg 9/5/2012 5:32:00 PM Consider adding in Capability Category Assessment / Technical Adequacy	PROPOSED RESOLUTION – Added “Fire PRA Technical Adequacy Assessment (similar to LAR change evaluation figures)
23.	Page 6: Comment [S18] scd1S 8/30/2012 11:51:00 AM Same bullets on page J-1	PROPOSED RESOLUTION – Removed from Appendix J
24.	Page 6: Comment [S19] scd1S 8/31/2012 2:07:00 PM If conducive, do you need to risk inform or can you risk inform?	PROPOSED RESOLUTION – Added clarifying note.
25.	Page 6: Comment [eak20] ekleinsorg 9/6/2012 9:27:00 AM NRC MEETING: Need to look at tying to risk process	PROPOSED RESOLUTION – Added clarifying note.
26.	Page 6: Comment [eak21] ekleinsorg 9/6/2012 10:18:00 AM NRC MEETING: Need to flesh out	PROPOSED RESOLUTION- Tried to make a closer tie to methodology changes.
27.	Page 6: Comment [S22] scd1S 9/6/2012 9:24:00 AM Both these seem to look at changes to the FPP to see how the general method and requirements are affected. How about evaluating changes to the general method and requirements which might flow back into the FPP?	PROPOSED RESOLUTION- Tried to make a closer tie to methodology changes.
28.	Page 7: Comment [S23] scd1S 8/30/2012 1:48:00 PM Attachment J only adds acceptance guidelines, why do that in Appendix J and not here?	PROPOSED RESOLUTION – Moved acceptance guidelines to Section 5.3.2.2.
29.	Page 7: Comment [eak24] ekleinsorg 9/6/2012 10:21:00 AM NRC MEETING: Performed in accordance with the License Condition	PROPOSED RESOLUTION – Added “performed in accordance with the license condition.”

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30.	Page 7: Comment [C25] cem4 8/29/2012 12:11:00 PM What about the population of changes that can be? For example changing the responsiveness of a detection or suppression system or a passive barrier?	PROPOSED RESOLUTION – Added discussion about the potential need to address via the change in risk subject to the license condition acceptance criteria.
31.	Page 7: Comment [S26] scd1S 8/30/2012 1:57:00 PM No J.2.6, J.6.2 is cumulative PRA risk – did you mean that?	PROPOSED RESOLUTION – Changed to J.6.2.
32.	Page 7: Comment [S27] scd1S 8/31/2012 8:21:00 AM No J.2.6, J.6.2 is cumulative PRA risk – did you mean that?	PROPOSED RESOLUTION – Changed to J.6.2.
33.	Page 7: Comment [S28] scd1S 8/31/2012 8:21:00 AM ?	PROPOSED RESOLUTION - PROPOSED RESOLUTION – Removed “within limits”.
34.	Page 8: Comment [S29] scd1S 8/31/2012 8:23:00 AM No J.2.6, J.6.2 is cumulative PRA risk – did you mean that?	PROPOSED RESOLUTION – Changed to J.6.2.
35.	Page 8: Comment [eak30] ekleinsorg 9/6/2012 10:24:00 AM NRC MEETING: NRC stated that this didn’t really apply	PROPOSED RESOLUTION – No change made yet.  Need more discussion with NRC staff on cumulative risk.
36.	Page 8: Comment [S31] scd1S 8/31/2012 2:10:00 PM Should define minimal. If it cannot be determined whether risk increases or decreases the change is minimal.	PROPOSED RESOLUTION: Additional discussion is needed with the NRC on the definition of minimal.
37.	Page 9: Comment [S32] scd1S 8/31/2012 2:11:00 PM These are “routine minor changes” that do not screen out as less than minimal?	PROPOSED RESOLUTION – Removed the sentence regarding “routine minor changes.
38.	Page 9: Comment [eak33] ekleinsorg 9/5/2012 5:34:00 PM Remove	PROPOSED RESOLUTION – Removed the sentence regarding “routine minor changes.
39.	Page 10: Comment [eak34] ekleinsorg 9/5/2012 5:34:00 PM formatting/ presentation needs to be fixed	PROPOSED RESOLUTION – Incorporated.

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40.	Page 11: Comment [eak35] ekleinsorg 9/5/2012 5:35:00 PM Need to verify	PROPOSED RESPONSE: Rewrote section.
41.	Page 11: Comment [S36] scd1S 8/31/2012 8:43:00 AM This is unnecessary and could be misleading when a plant specific license condition differs.	Incorporated. Removed license condition.
42.	Page 11: Comment [S37] scd1S 8/31/2012 2:12:00 PM Simply repeating other documents is of little use.	Incorporated. Removed the information from NEI 00-01.
43.	Page 11: Comment [S38] scd1S 8/31/2012 9:56:00 AM Where does this come from?	The information is from NEI 04-02, Section 5.3.5.3. PROPOSED RESOLUTION – Removed the “miscellaneous”. These categories were conceived many years ago as part of development of NEI 04-02. Changed the characterization to “examples”.
44.	Page 11: Comment [eak39] ekleinsorg 9/5/2012 5:36:00 PM FAQ 54, NEI 04-02	The information is from NEI 04-02, Section 5.3.5.3.  The information is from NEI 04-02, Section 5.3.5.3. PROPOSED RESOLUTION – Removed the “miscellaneous”. These categories were conceived many years ago as part of development of NEI 04-02. Changed the characterization to “examples”.
45.	Page 12: Comment [S40] scd1S 8/31/2012 9:59:00 AM Is this a review of the PRA success criteria?	PROPOSED RESOLUTION- This discussion of “Plant System Performance” was developed in 2005 by NEI to try to provide different ways in which SM could be evaluated. This section was intended to be more for deterministic analysis (NSCA, with the PRA logic model addressing the PRA.
46.	Page 12: Comment [S41] scd1S 8/31/2012 10:00:00 AM Using MAAP to develop timing will automatically lead to reducing the safety margins in the design basis	PROPOSED RESOLUTION – MAAP is typically used for PRA applications.
47.	Page 12: Comment [S42] scd1S 8/31/2012 9:57:00 AM What does this mean?	PROPOSED RESOLUTION – Use of acceptable PRA methods should be acceptable from a safety margin perspective.
48.	Page 12: Comment [eak43] ekleinsorg 9/6/2012 10:31:00 AM NRC MEETING: NRC stated that they do not think we meet this... We committed to update	PROPOSED RESOLUTION – Removed the information related to “Miscellaneous”
49.	Page 12: Comment [S44] scd1S 8/31/2012 2:13:00 PM This section says nothing	PROPOSED RESOLUTION – Removed the information related to “Miscellaneous”

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50.	Page 12: Comment [S45] scd1S 8/31/2012 2:13:00 PM And how is the analysis of uncertainties accomplished?	PROPOSED RESOLUTION – Added wording suggested by NRC staff.  Need additional discussion on this topic with NRC staff.
51.	Page 12: Comment [eak46] ekleinsorg 9/6/2012 10:37:00 AM NRC MEETING: Add more information about what the uncertainty analysis considers	PROPOSED RESOLUTION – Added wording suggested by NRC staff.  Need additional discussion on this topic with NRC staff.
52.	Page I-1: Comment [eak47] ekleinsorg 9/6/2012 10:38:00 AM NRC MEETING: The NRC would like the list of question The NRC would like to have some discussion in the upfront section of the FAQ that addresses the deleted FAQs	PROPOSED RESOLUTION – Questions will be developed after agreement on structure of change process.  Added discussion to the upfront section of the FAQ.  During the preparation of FAQ 12-0061, many lessons were reviewed from the pilot plant experience. Some FAQs related to post-transition were developed very early in the pilot plant experience (2006 timeframe). This was recognized with the closure of two post-transition FAQs without resolution, in order to allow lessons to be learned (FAQs 06-0004 and 06-0005. Since then, the scope of the NFPA 805 program has changed and numerous lessons have been learned. For these reasons, the information in FAQ 12-0061 is proposed to supersede information in FAQs 06-0002 (NFPA 805 Chapter 4 Questions) and 06-003 (“Potentially Greater than Minimal”). Also, this FAQ also proposes to eliminate the forms conceived in NEI 04-02, Appendix I. These forms were considered by the NFPA 805 Task Force to be too simplified and not considered to be an effective tool for the licensees.
53.	Page I-1: Comment [C48] cem4 8/31/2012 8:37:00 AM The staff does not understand why Attachment I was deleted. What about FAQ 2?	See comment resolution for [eak47]
54.	Page J-1: Comment [C49] cem4 8/31/2012 8:44:00 AM It seems problematic to include quoted text from revision 1 of RG 1.205 when this version of 04-02 will be endorsed by revision 2 of the RG which may have different text, or differently numbered text.	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205

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55.	Page J-1: Comment [S50] scd1S 9/5/2012 5:37:00 PM Why is D-i-D called out here and nothing else? DIRECT QUOTE FROM RG 1.205	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205
56.	Page J-1: Comment [S51] scd1S 8/31/2012 2:16:00 PM Simply repeating other documents is of little use.	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205
57.	Page J-2: Comment [S52] scd1S 8/31/2012 2:17:00 PM Simply repeating other documents is of little use.	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205
58.	Page J-2: Comment [S53] scd1S 9/5/2012 5:37:00 PM Are licensees going to request this after transition? At a minimum, should go into J.3.	PROPOSED RESOLUTION: It is believed that they could. Moved text to Section 5.3.2.2.
59.	Page J-2: Comment [S54] scd1S 8/31/2012 2:18:00 PM Simply repeating other documents is of little use.	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205
60.	Page J-3: Comment [S55] scd1S 8/31/2012 2:18:00 PM Simply repeating other documents is of little use.	PROPOSED RESOLUTION – Attempted to remove most quoted material from RG 1.205  PROPOSED RESOLUTION – Moved info (not quoted) to Section 5.3.2.2.
61.	Page J-4: Comment [eak56] ekleinsorg 9/5/2012 5:38:00 PM OVERLAP WITH BULLET 2 – CLEAN UP LANGAUGE ALSO ADD TO J.5	PROPOSED RESOLUTION – Moved info and edited in Section 5.3.2.2.
62.	Page J-4: Comment [eak57] ekleinsorg 9/6/2012 10:41:00 AM NRC MEETING: If what we mean by 'within limits' are the bullets then tie them more strongly together	PROPOSED RESOLUTION – Removed “within limits”
63.	Page J-4: Comment [eak58] ekleinsorg 9/5/2012 5:39:00 PM DANA- look at potentially reorganizing PRA Vs FPP changes	PROPOSED RESOLUTION: Sections and Appendices re-organized in many ways.
64.	Page J-5: Comment [S59] scd1S 8/31/2012 2:18:00 PM FPP is not evaluated in PRA, only fire risk.	PROPOSED RESOLUTION – Incorporated.



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65.	Page J-5: Comment [S60] scd1S 8/31/2012 2:30:00 PM When modeling refinements are really new methods they should be treated under PRA quality.	PROPOSED RESOLUTION –Added wording addressing this topic.
66.	Page J-6: Comment [S61] scd1S 8/31/2012 10:58:00 AM Does this mean that, if the importance measures change substantially, all post-transition previously accepted changes will need to be re-evaluated?	PROPOSED RESPONSE: I don't believe that is what we want. This section was intended to be guidance to the licensee on review criteria for risk insights, with the cumulative risk being the measure of acceptability to address the cumulative risk guidance from RG 1.205 and RG 1.174.
67.	Page J-6: Comment [S62] scd1S 8/31/2012 10:58:00 AM What are these and what do you do with them?	PROPOSED RESPONSE: These are examples that could be reviewed after a Fire PRA is updated or upgraded. By reviewing importance measures, decisions could be made to change compensatory measures, procedures, etc.
68.	Page J-6: Comment [eak63] ekleinsorg 9/5/2012 5:40:00 PM Is this too restrictive – will examples become requirements?	PROPOSED RESPONSE: Changed text to emphasize that they are examples.
69.	Page J-6: Comment [S64] scd1S 8/31/2012 10:59:00 AM Why? Because the re-evaluated previously approved changes now exceed the cumulative acceptance guidelines?	PROPOSED RESPONSE: I don't believe that is what we want. This section was intended to be guidance to the licensee on review criteria for risk insights, with the cumulative risk being the measure of acceptability to address the cumulative risk guidance from RG 1.205 and RG 1.174.
70.	Page J-6: Comment [S65] scd1S 8/31/2012 11:00:00 AM What does this mean? How do you "address" what "issues"?	PROPOSED RESPONSE Changed "issues" to "insights". You could address insights by making changes to procedures, changing compensatory measures, changing procedures, making a decision to bolster defense-in-depth, etc.
71.	Page J-6: Comment [S66] scd1S 8/31/2012 11:01:00 AM Is this to be done instead of re-evaluating all previously accepted post transition changes for each new change?	PROPOSED RESOLUTION: Added the following for clarification to section 5.3.1.3:  This process is intended to be guidance for review of individual plant changes, where the changes are assessed against the acceptance criteria. Another process for addressing Fire PRA updates and cumulative risk is provided in Appendix J. The process for addressing Fire PRA updates and cumulative risk is intended to be performed periodically as Fire PRA updates are made, but are not intended to replace the review

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72.	Page J-6: Comment [eak67] ekleinsorg 9/5/2012 5:40:00 PM Does this need to be on a fire area basis	PROPOSED RESOLUTION: That is the initial proposal. It would be meaningful, if not necessary, to pilot this process.
73.	Page J-7: Comment [S68] scd1S 8/31/2012 11:04:00 AM What is the relationship between Step 1 and Step 2, they are normally independent.	PROPOSED RESOLUTION: Revised flowchart to reflect these activities as concurrent processes, rather than sequential steps.
74.	Page J-7: Comment [eak69] ekleinsorg 9/5/2012 5:41:00 PM Do these need to be done on a fire area basis	PROPOSED RESOLUTION: That is the initial proposal. It would be meaningful, if not necessary, to pilot this process.
75.	Page J-7: Comment [S70] scd1S 8/31/2012 11:06:00 AM To be done in addition to the change process calculations?	<p>PROPOSED RESOLUTION: Added the following for clarification to section 5.3.1.3:</p> <p>This process is intended to be guidance for review of individual plant changes, where the changes are assessed against the acceptance criteria. Another process for addressing Fire PRA updates and cumulative risk is provided in Appendix J. The process for addressing Fire PRA updates and cumulative risk is intended to be performed periodically as Fire PRA updates are made, but are not intended to replace the review</p>
76.	Page J-7: Comment [S71] scd1S 8/31/2012 11:44:00 AM This is to be done independently and in lieu of any specific change request?	<p>PROPOSED RESOLUTION: Added the following for clarification to section 5.3.1.3:</p> <p>This process is intended to be guidance for review of individual plant changes, where the changes are assessed against the acceptance criteria. Another process for addressing Fire PRA updates and cumulative risk is provided in Appendix J. The process for addressing Fire PRA updates and cumulative risk is intended to be performed periodically as Fire PRA updates are made, but are not intended to replace the review</p>
77.	Page J-9: Comment [S72] scd1S 8/31/2012 11:44:00 AM Where is this second aspect addressed below?	PROPOSED RESOLUTION: Changed to "two aspects, consistent with RG 1.205.
78.	Page J-9: Comment [S73] scd1S 8/31/2012 11:14:00 AM The rule requires that the PRA approach, methods, and data shall be acceptable to the AHJ.	Added the NFPA 805 Section 2.4.3.3 requirements in the "Technical Adequacy" Section 5.4.3.1.

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79.	Page J-9: Comment [S74] scd1S 8/31/2012 11:18:00 AM The peer review itself satisfies RG 1.200, appropriate technical adequacy itself is initially measured by the results of the peer review.	PROPOSED RESOLUTION: Agree
80.	Page J-9: Comment [S75] scd1S 8/31/2012 11:19:00 AM Not sure where this comes from and what it means	PROPOSED RESOLUTION: Removed sentence.
81.	Page J-9: Comment [S76] scd1S 8/31/2012 11:21:00 AM What sections are these?	PROPOSED RESOLUTION: This was intended to be a question to ensure that the Fire PRA for the change being reviewed was up to date (e.g., if there were outstanding changes related to the feature or area of the plant, it could challenge the ability of the Fire PRA analyst to accurately assess the change in risk.
82.	Page J-9: Comment [S77] scd1S 8/31/2012 11:21:00 AM How are these identified?	PROPOSED RESPONSE: Need additional discussion on this topic with NRC staff.
83.	Page J-10: Comment [S78] scd1S 8/31/2012 11:23:00 AM So the NRC needs to review and accept these methods during the review of this FAQ?	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
84.	Page J-10: Comment [S79] scd1S 8/31/2012 11:25:00 AM Treatment is method?	PROPOSED RESPONSE: Changed wording to method.
85.	Page J-10: Comment [S80] scd1S 8/31/2012 11:25:00 AM Anything other than "not-met" could be considered a SR that is endorsed by RG 1.200	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
86.	Page J-10: Comment [S81] scd1S 8/31/2012 11:27:00 AM How is the in-situ configuration related to treatment (method)?	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
87.	Page J-10: Comment [S82] scd1S 8/31/2012 11:28:00 AM Focused scope Peer review that determines the licensee has appropriately applied an acceptable method should suffice.	Agree

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88.	Page J-10: Comment [eak83] ekleinsorg 9/6/2012 12:52:00 PM NRC MEETING: Clean up table. Check whether method and treatment are the same Provide examples of changes in each of the section of Appendix J	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
89.	Page J-11: Comment [C84] cem4 8/31/2012 3:05:00 PM Three ways and both? This is confusing.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
90.	Page J-11: Comment [C85] cem4 8/31/2012 3:05:00 PM How is a floor drain like detection?	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
91.	Page J-12: Comment [C86] cem4 8/31/2012 3:06:00 PM Which points to No. 1; and is not about suppression anyway.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
92.	Page J-12: Comment [C87] cem4 8/31/2012 3:07:00 PM This is a bit strong.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
93.	Page J-12: Comment [C88] cem4 8/31/2012 3:06:00 PM Do you mean 7? Additionally, incipient detection has approved models specifically for these systems.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
94.	Page J-12: Comment [C89] cem4 8/31/2012 3:07:00 PM Floor drains?	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
95.	Page J-13: Comment [S90] scd1S 8/31/2012 11:48:00 AM This shows up in most of these models.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
96.	Page J-13: Comment [C91] cem4 8/31/2012 3:09:00 PM Changes in ventilation may also have effects on fire scenarios and target vulnerabilities. Changes to ventilation parameters should be reflected in appropriate changes to fire modeling scenarios, and the change in risk due to the changed scenarios calculated. Plus radioactive release considerations.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.

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No.	Comment	Response
97.	Page J-14: Comment [C92] cem4 8/31/2012 3:00:00 PM Caution should be exercised when making actual changes to "Chapter 3" FPP elements as opposed to changes in the way that the PRA takes credit for the element. For example, a licensee is not able to self-approve changing the fire brigade from 5 member to 4, but may be able to approve a change to reduce the credit taken for manual suppression in the PRA.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
98.	Page J-14: Comment [S93] scd1S 8/31/2012 11:49:00 AM Method?	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.
99.	Page J-14: Comment [S94] scd1S 8/31/2012 11:50:00 AM This is not sufficient.	PROPOSED RESPONSE: NEI Task Force is reviewing this table and is re-thinking its format and content. Additional discussion is needed on this topic.