

November 28, 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 NOVEMBER 15, 2012, CATEGORY 2
MEETING REGARDING THE NATIONAL FIRE PROTECTION
ASSOCIATION STANDARD 805 FREQUENTLY ASKED
QUESTION PROCESS

On November 15, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with stakeholders and the public to discuss Frequently Asked Questions (FAQs) at plants that are adopting National Fire Protection Association Standard 805 (NFPA 805). Licensees and the NRC staff discussed the list of currently open FAQs. The participants determined that both industry stakeholders and the NRC staff needed to continue to work on the remaining open FAQs.

The participants discussed a new revision to FAQ 12-0061, which deals with the post transition change process. The NRC staff discussed, at a high level, their reaction to the new revision, which had been submitted a few days earlier. Representatives of the Nuclear Energy Institute (NEI) identified a number of areas where they stated that additional detail needed to be developed, including the definition of "greater than minimal" and how to handle cumulative changes. The participants agreed that a separate working-level public meeting should be held to discuss the details of the FAQ. No date was set for this meeting.

The participants discussed FAQ 12-0064, which deals with transient and hot work ignition frequency apportionment for probabilistic risk assessments (PRAs). The NRC staff stated that they would be issuing a closure memo on this FAQ, limited to the scope of the current version. The NRC staff further stated that related topics, such as area weighting factors, would not be addressed, but might be candidates for resolution through the forthcoming industry-led PRA resolution process. NEI representatives agreed with this approach once the NRC stated that all the other industry comments had been addressed.

The NRC staff described, at a high level, the outline of a FAQ, which deals with documenting the results of a circuit analysis expert panel. One topic of discussion was the process for publicizing this "FAQ," since there are aspects applicable to non-NFPA 805 licensees. NEI

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representatives stated that they would hold internal discussions and be prepared to discuss options with the NRC staff at a public meeting on November 20, 2012. Participants determined that this would be FAQ 65.

NEI representatives briefly described two new FAQs, one which deals with incipient fire detection in main control room and area wide installations, and one which deals with the NFPA 805 Chapter 3 requirements for spare transformers. Participants determined that these would be FAQs 66 and 67, respectively.

The meeting participants discussed the NFPA 805 generic question matrix. It was determined that the majority questions were PRA-focused (shaded yellow on the matrix), and thus outside the purview of the current meeting, or resolved by changes to the industry's License Amendment Request template. The exceptions include items 5, which deals with the required level of detail for documenting defense in depth and safety margin, 11, which deals with the required level of detail for documenting safe and stable conditions, and 15, which deals with performance-based equipment maintenance intervals. Participants determined that these items required additional discussion to resolve.

The NRC staff and stakeholders agreed that the next FAQ meeting would take place on December 20, 2012.

The meeting handouts are available in the Agencywide Documents Access and Management System. The revision of FAQ 12-0061 is available at ML123180049. A comment resolution matrix for the revised FAQ 12-0061 is available at ML123180051. The outline for the new NRC FAQ is available at ML12320A237. Handouts related to the generic questions matrix are available at ML123200036 and ML123320080. The September NEI NFPA 805 Task Force FAQ Log is available at ML122550084. The NRC NFPA 805 FAQ status and history document is available at ML123180055.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

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NAME	CMoulton	AKlein
DATE	11/27/12	11/28/12

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NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
FREQUENTLY ASKED QUESTIONS PROCESS
LIST OF ATTENDEES

November 15, 2012

U. S. Nuclear Regulatory Commission Staff

B. Litkett
C. Moulton * participated via phone
D. Andrukat
D. Frumkin
G. Cooper
H. Barrett
N. Melly*
P. Lain

Stakeholders

A. Ratchford (Kleinsorg Group)
B. Simril (TVA)
E. Kleinsorg (Kleinsorg Group)
J. Butler (NEI)
J. DeJoseph (Duke)
J. Ertman (Progress)
J. Hiller (AmerenUE)*
K. Zee (ERIN)
R. Neild (Constellation)
T. Shudak (NPPD)
V. Anderson (NEI)
V. Rubano (FPL)

ENCLOSURE