

## **NRR-PMDAPEm Resource**

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**From:** Feintuch, Karl  
**Sent:** Friday, March 08, 2013 3:47 PM  
**To:** Swenzinski, Laura  
**Cc:** Robinson, Jay; Harrison, Donnie; Lain, Paul; Fields, Leslie  
**Subject:** ME6818 - DA - NFPA-805 adoption - Request for Portal locations to selected RAI responses  
**Attachments:** ME6818 DA NFPA-805 Portal locations of selected RAI Responses .docx

Attached are some requests for portal location for selected RAI responses. We think that all of the information of interest exists within RAI response supplements sent to us earlier. If it becomes necessary to amplify on a response, please use the spaces provided in the attachment.

Please call me on Monday, March 11, 2013 to let me know when we can expect a response

In addition, please contact me if you need to discuss what we have requested.

Karl Feintuch  
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301-415-3079

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 625

**Mail Envelope Properties** (Karl.Feintuch@nrc.gov20130308154600)

**Subject:** ME6818 - DA - NFPA-805 adoption - Request for Portal locations to selected RAI responses  
**Sent Date:** 3/8/2013 3:46:48 PM  
**Received Date:** 3/8/2013 3:46:00 PM  
**From:** Feintuch, Karl

**Created By:** Karl.Feintuch@nrc.gov

**Recipients:**

"Robinson, Jay" <Jay.Robinson@nrc.gov>  
Tracking Status: None  
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Tracking Status: None  
"Lain, Paul" <Paul.Lain@nrc.gov>  
Tracking Status: None  
"Fields, Leslie" <Leslie.Fields@nrc.gov>  
Tracking Status: None  
"Swenzinski, Laura" <Laura.Swenzinski@nexteraenergy.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>	
MESSAGE	515	3/8/2013 3:46:00 PM	
ME6818 DA NFPA-805 Portal locations of selected RAI Responses .docx			29881

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

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**Request to locate responsive information from RAI response information received.**

*Please point to the portal location for each item. If there needs to be any clarifying comments, please include them. Please insert remarks in the box provided.*

1. F&O 2-20 and 5-29. The response to RAI-PRA-14 includes added cable spreading room analysis using NUREG/CR-6850 FIF and modeling from the CSR risk evaluation report. This modeling considered prompt suppression, plant trip, offsite power, Div. 1 availability, Div. 2 availability, ASC availability, ASC mitigation. Please point the staff to the portal location for the following modeling considerations:

- a. For plant trip where there is no data, a 50/50 split is assumed to be a point estimate for the case. Please point to the justification/basis for this assumption.

- b. For offsite power, the point estimate case assumes 13% of the time offsite power will be lost based on offsite power cables routed in approximately 85 routing points of the total of 660 in the NCSA database. The upper bound estimate is taken as 20%. Please point to the detailed justification/basis for this assumption (e.g., an examination to ensure that the routing points are equally susceptible to damage or if there are particularly susceptible routing points that do or do not impact offsite power).

- c. The likelihood that Division 1 paths will be available from the control room depends on the resolution of PRA RAI 20. For the likelihood that the ASC will be impacted by the fire, a 50/50 split is used for both the point estimate and the upper bound. Please point to the justification/basis for this assumption, including fire modeling or fire modeling assumptions if applicable.

- d. It appears that the CSR risk analysis credits prompt suppression for transient fires. However, per NUREG/CR-6850, Attachment P, prompt suppression can only be credited for hot work fire scenarios in which a continuous fire watch is present; this credit does not apply for transient fires. Please point to the justification/basis for this assumption of credit for prompt suppression and/or point to a sensitivity analysis following the NUREG/CR-6850 guidance.

- e. In the CSR Risk Report, the LERF was estimated to be 30% of CDF based on the CDF/LERF ratio from the FPIE PRA. Use of the FPIE PRA to estimate FPRA LERF for this fire scenario is not applicable; rather the FPRA LERF should consider the FPRA model. Please point to the LERF analysis for this fire scenario based on the FPRA and the associated revised results.

- f. RAI-PRA-14 requested a sensitivity analysis for the CSR that applies the guidance in NUREG/CR-6850 with no deviations. The response provided a sensitivity analysis that appeared to be only on the post-transition CSR. Please point to the sensitivity analysis that contains the delta CDF and delta LERF (for any VFDRs) for this sensitivity analysis,

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including the discussion of any modeling changes from the response to RAI-PRA-14 due to the above modeling considerations.

2. In a letter dated May 23, 2012, (ADAMS Accession No. ML12146A094) you responded to Fire Modeling RAI-FM-1. The response discussed the impact of transient fire locations near walls or in corners on risk from control room abandonment which included the statement, "given the 98th percentile transient fire in a corner...." Please point the staff to the portal location for the analysis associated with this statement, including the justification for the HRR and any sensitivity studies (providing impacts on CDF, LERF, delta CDF, and delta LERF) performed if the HRR differs from previously accepted approaches.

3. In a letter dated May 23, 2012, (ADAMS Accession No. ML12146A094) you responded to Probabilistic Risk Assessment RAI-PRA-20 and provided the CCDP and CLERP but not the discussion of the analyses, assumptions, and ignition frequency that was requested. Please point the staff to the portal location for the discussion on the analysis, assumptions, and ignition frequency related to this response.

4. Section 5.1.4 of the Fire Scenario Report discusses treatment of sensitive electronics. It appears that it was assumed that, since sensitive electronics are always in cabinets, the protection provided by cabinets justifies using the cable damage criteria rather than the lower damage criteria for sensitive electronics in the determination of the ZOI. A critical factor in the determination of the acceptability of this approach is assurance that the subject electronics are not subject to direct radiation heat transfer (such as would occur if mounted on the cabinet surface). Please point the staff to the portal location for the justification/basis and supporting information (i.e., confirmation that the subject sensitive electronic are not mounted on the cabinet surface) to support the acceptability of this approach.