

May 6, 2013

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 APRIL 25, 2013, CATEGORY 2 MEETING
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805: NUCLEAR REGULATORY COMMISSION/NUCLEAR
ENERGY INSTITUTE MANAGEMENT DISCUSSION

On April 25, 2013, the U.S. Nuclear Regulatory Commission (NRC) Division of Risk Assessment (DRA) management held a meeting with Nuclear Energy Institute (NEI) management to discuss questions requiring management attention related to National Fire Protection Association Standard 805 (NFPA 805).

The participants discussed, at a high level, the following topics:

- Discussion of issues related to the LAR reviews and safety evaluation issuance
 - DRA management stated that the first non-pilot safety evaluation is being prepared for issuance in the next few months.
 - DRA management stated that efficiencies are being explored for the final processing of safety evaluations
 - DRA management stated that one such efficiency would be a dedicated project manager to assist in processing the safety evaluations
 - NEI representatives stated that early communication on these topics would be key to success of the over-all effort by minimizing surprises late in the process:
 - Discussion of license condition elements
 - Adequacy of responses to requests for additional information (RAIs)
 - NRC staff stated that they would look into how best to communicate RAI response adequacy to licensees.
 - NRC staff stated that discussing the license condition with the licensee was already a part of finalizing the safety evaluation, and such communication was starting to happen with the early non-pilot applicants (i.e., DC Cook).

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- Discussion of issues concerning probabilistic risk assessments (PRAs)
 - DRA management asked about progress in implementing the industry PRA methods review panel
 - NEI representatives stated that they expected that new industry resources would be brought to bear to get that process moving.
 - NEI representatives asked about a PRA-related document that had been potentially improperly publicly released.
 - NRC staff stated that they would look into the issue.
- DRA management asked whether any additional licensees were considering transition to NFPA 805.
 - NEI representatives stated that they did not know of any, but that they would look into it.
- NRC schedule for completing NFPA 805 application reviews
 - NRC staff stated that rows for the Browns Ferry, Ginna, St. Lucie, and San Onofre applications had been added to the schedule matrix.
 - NRC staff stated that these schedules would be filled in once each application was officially accepted for review.

The participants agreed that the next meeting would be a teleconference on May 23, 2013.

The meeting handout is available in the Agencywide Documents Access and Management System. The review completion schedule is available at accession number ML13119A030.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

- Discussion of issues concerning probabilistic risk assessments (PRAs)
 - NEI representatives proposed a definition of “deviation from NUREG/CR-6850”
 - Deviation from NRC-accepted Fire PRA methods for NFPA 805 applications: An approach, method, or data, which is unique to Fire PRA and specific to 10 CFR 50.48(c), that differs from that explicitly described in NRC-accepted documents related to FPRA methods.
 - NEI representatives expressed concern regarding the timing of the resolution of PRA credit for very early warning fire detection systems (incipient detection).
 - DRA management suggested that system performance data was available to the manufacturers and also suggested that the industry should attempt to obtain it
 - NEI representatives agreed
 - NEI representatives stated that a path forward should be developed for low significance unreviewed analysis methods (UAMs) for PRAs.
 - Participants agreed to add this as an agenda item for the next meeting.
- NEI representatives asked about the possibility of holding a transition workshop in the summer of 2013.
 - The NRC staff stated that there were currently not enough open questions in light of the amount of effort required to hold a workshop.
 - Participants agreed that the idea of a workshop would continue to be discussed at future meetings.

The participants agreed that the next meeting would be a teleconference on April 25, 2013.

The meeting handout is available in the Agencywide Documents Access and Management System. The review completion schedule is available at accession number ML13119A030.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

DISTRIBUTION:

DRA R/F	AKlein	PLain	APearson	RDaley, RIII	MKing, RII
CMoulton	HBarrett	HHamzehee	GMiller, RIV	JRogge, RI	

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Date	04 / 30 /13	04 / 06 /13	04 / 02 /13

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**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
NRC/NEI MANAGEMENT DISCUSSION
LIST OF ATTENDEES**

April 25, 2013

U. S. Nuclear Regulatory Commission Staff	Stakeholders
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A. Pearson
C. Moulton
H. Barrett
H. Hamzehee
J. Giitter
J. Robinson*
L. Fields
S. Dinsmore

A. Afzali (Southern)*
A. Hazelhoff (ENERCON)*
A. Ratchford (Kleinsorg Group)*
E. Kleinsorg (Kleinsorg Group)*
F. dePeralta (Tri-en Corp)*
F. Mantine (First Energy)*
G. Harris (AmerenUE)*
J. Butler (NEI)*
J. Chapman (Sciencetech)*
J. Ertman (Duke)*
K. Zee (ERIN)*
L. Hughes (Southern Nuclear)*
M. Lilley (Constellation)*
P. Amico (SAIC)*
R. Nance (Entergy)*
S. Einbinder (Excel Energy)*
S. Weimer (Entergy)*
T. Stanton (PG&E)*
V. Anderson (NEI)*
V. Rubano (FPL)*

* participated via phone

ENCLOSURE