

## Response to NRC Comments on Proposed Definitions on FAQ 68

### 1. Original Definition

Acceptable to the NRC – Acceptable by endorsement or by unit-specific approval.  
Unit-specific approval is only applicable to the specific unit.

NRC comment: *"Acceptability may include consistent with NRC guidance, not just approval."*

### Revised Definition or Industry Response

Acceptable to the NRC – Acceptable due to consistency with NRC guidance, by NRC endorsement, or by unit-specific NRC approval. Unit-specific NRC approval is only applicable to the specific unit.

### 2. Original Definition

Adequate for the hazard – The effectiveness of the fire protection features shall be evaluated in relation to their ability to detect, control, suppress, and extinguish a fire and provide passive protection to achieve the performance criteria and not exceed the damage thresholds defined in NFPA 805, Section 2.5 for the plant area being analyzed.

NRC comment: "This definition references NFPA 805, Section 2.5, Evaluating the Damage Threshold – for fire modeling. The application of the term is NFPA 805, Section 3.8, 3.9, 3.10, and 3.11, where NFPA 805 includes an, "If" statement."

### Revised Definition or Industry Response

Adequate for the hazard – The effectiveness of the fire protection features to detect, control, suppress, and extinguish a fire and provide passive protection to achieve the performance criteria. The application of this term involves engineering evaluations supporting compliance with the criteria of NFPA 805 Sections 3.8, 3.9, 3.10, and 3.11.

### 3. Original Definition

Bound the risk impact - A qualitative or quantitative method that is not specifically applied to NFPA 805 risk assessments, but can be shown to be applicable and is equal or less in level of risk.

NRC comment: Change less than to greater than, as in: "is equal or greater than the level of risk."

### Revised Definition or Industry Response

Bound the risk impact - A qualitative or quantitative method that is not specifically applied to NFPA 805 risk assessments, but can be shown to be

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applicable, and which indicates risk that is greater than or equal to the actual level of risk.

### 4. Original Definition

Clearly show decrease in risk – A qualitative or quantitative evaluation demonstrates that the change will reduce risk.

NRC comment: "The provided definitions do not address the subjective words, 'Bound,' and, 'Clearly'."

### Revised Definition or Industry Response

Response: The previous definition defines "bound the risk impact." The term "bound" and "bounding" are used extensively in NRC guidance documents and are not defined beyond the English usage. The word "clearly" is not defined, as the meaning of the phrase is not changed if it is removed. The proposed definition is unchanged.

### 5. Original Definition

Qualified fire protection engineer – See Regulatory Guide 1.189, Rev. 2, Section 1.6.1.A.

NRC comment: "This is an enhancement since defined in RG 1.189. A pointer could be added to RG 1.205 if needed."

### Revised Definition or Industry Response

Response: The industry recommends adding the pointer for those not familiar with the content of the various applicable Regulatory Guides. The proposed definition is unchanged.

### 6. Original Definition

Relevant technical requirement or standard - A technical requirement or standard that can be shown to have a direct relation to or impact on the evaluation of the functionality of a component, system, procedure, or physical arrangement.

NRC comment: "The clarification does not answer the concern listed elsewhere in the FAQ, 'relevant to what standard is not stated'."

### Revised Definition or Industry Response

Response: The industry believes the proposed definition proved criteria for determining if a requirement or standard is relevant to the evaluation. The proposed definition is unchanged.