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**Docket:** NRC-2013-0103

Compensatory and Alternative Regulatory Measures for Nuclear Power Plant Fire Protection (CARMEN-FIRE)

**Comment On:** NRC-2013-0103-0001

Compensatory and Alternative Regulatory Measures for Nuclear Power Plant Fire Protection (CARMEN-FIRE)  
- Draft Report for Comment

**Document:** NRC-2013-0103-DRAFT-0002

Comment on FR Doc # 2013-18168

## Submitter Information

7/29/2013  
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## General Comment

1

Draft NUREG/CR-7135 discusses continuous fire watch and the option to cover more than one area provided it is done in 15 minutes. However, it says the areas covered must be within a "single fire area". I disagree with this limitation. Many plant fire areas are small (one room) and walking between these single room fire areas can easily be done in far less than 15 minutes. I cannot think of a valid reason to limit the 15 minute option to a single fire area. Whether the person walks through a fire area boundary fire door into another fire area or whether the person walks through a non-rated door into a different room of the same fire area, it takes the same amount of time. This expectation may make sense for a huge fire area like the turbine building, but has no safety benefit for the rest of the plant.

In the infrequent times where we use this 15 minute option (typically when power to the fire detection is OOS for maintenance), the areas cannot be so far apart that 15 minutes walking to each area is not possible. Plus, the person cannot cross containmented area step off pads.

Please remove the expectation that the 15 minute option only be used for multiple impairment within a "single fire area".

Other minor comments: 1) Other comp measures can include the use of portable detection units. Various plants use these; 2) there is very little discussion about getting the comp measures in-place with 1 hour. In cases where the area is high rad, some plants allow more time to installing video systems with the monitor outside where the dose is lower; and 3) I find chapter 5 confusing. This could be better explained/presented.

**SUNSI Review Complete**

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