

December 20, 2013

MEMORANDUM TO: Alexander R. Klein, Chief  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Leslie C. Fields, Sr. Project Manager */RA/*  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 25, 2013, CATEGORY 2 PUBLIC MEETING  
WORKSHOP WITH THE NUCLEAR ENERGY INSTITUTE AND  
STAKEHOLDERS TO DISCUSS THE NATIONAL FIRE PROTECTION  
ASSOCIATION STANDARD 805

On October 25, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting workshop with the Nuclear Energy Institute (NEI) and the nuclear industry representatives to discuss the National Fire Protection Association Standard 805 (NFPA 805) at the NRC White Flint North Offices in Rockville, MD. The purpose of the meeting was to obtain industry and external stakeholder feedback regarding NFPA 805 licensing reviews.

A summary of the topics discussed at the meeting included: status of License Amendment Review submittals, lessons learned, technical challenges, resource challenges, and communication strategies. To improve the efficiency and effectiveness of the NFPA 805 transition process, actions items were developed for both the NRC and industry at the meeting.

Based on the input provided by NEI and industry, the NRC plans to make informed decisions pertaining updates associated with NFPA 805 licensing reviews. At the conclusion of the meeting, a series of forward-focused action items were established to allow NRC staff and industry to move forward with a common goal.

No public comments were provided during the meeting.

The meeting notice, presentation materials, attendance lists, and action items for the path forward associated with this public workshop are available at ADAMS Accession Nos. ML13297A467 and ML13270A258.

Enclosure:  
As stated

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## NFPA 805 Public Workshop

On October 25, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public workshop to obtain industry and external stakeholder feedback regarding the NFPA 805 licensing reviews. Representatives from the NRC and industry discussed NFPA 805 lessons learned, which led to an in-depth analysis of the areas of success, changes to the process, and areas that will require further interaction between the two parties.

The NRC staff and the industry were able to agree on a number of notable successes with the NFPA 805 reviews. NRC staff and stakeholders discussed topics pertaining to the transition process with effective communication between all participants. Participants agreed that the first phase of the acceptance reviews of the initial set of non-pilot Licensing Amendment Reviews (LARs) were conducted efficiently, as were the site audits. It was observed that use of portals and pre-audit meetings were contributing factors to the success of the audits. In addition, it was agreed that the Frequently Asked Questions processes effectively enabled the NRC staff and the industry to resolve method issues pertaining to NFPA 805. LAR and Safety Evaluation (SE) templates, from the industry and the NRC staff, respectively, successfully provided a strong foundation to the process by providing consistent guidance on format and content.

To improve the NFPA 805 LAR review process moving forward, the NRC and the industry have agreed to implement a progression of changes, starting with a major change in the review process. The NRC changes which resulted from NRC lessons learned review (above) were communicated to the external stakeholders at this public meeting. The stakeholders present were supportive of the changes as communicated. These included:

- Moving the on-site audit to 9 to 12 months into the review cycle
- Establishing a goal for only one round of RAIs
- Early communication of unacceptable RAI responses
- Developing and tracking metrics
- Assessing and implementing ways to reduce or eliminate iterative PRA sensitivity analyses
- Improving internal guidance to reviewers on the depth of review
- Increasing coordination with Regions
- Soliciting stakeholder feedback on research programs

In response to the discussions that occurred during this meeting, the industry agreed to make several changes as well. In particular, the industry agreed to:

- Address “generic RAIs” in new submittals
- Support LAR audits with sufficient technical staff
- Ensure complete and accurate disposition of PRA findings and observations
- Develop and track metrics
- Work through issues related to transition

ENCLOSURE

Three major issues, identified at the workshop, require further discussion.

1. **Fire PRA Predictability.** The industry proposed that the NRC be more involved with the fire PRA peer reviews. NRC staff responded with questions regarding resources, independence, and future implications. The topic of a “frozen” fire PRA early in the LAR was also discussed, which pertained to eliminating sensitivity analyses for “less important” discrepancies and changes. The industry discussed the possibility of developing a cooperative plan which would outline the steps needed to develop more realistic methods to the point that both the industry and the NRC staff find them acceptable. The industry also discussed concerns with how the fire PRA peer review information is used during the NRC review. Further interaction is needed for the NRC staff to understand this concern.
2. **Communication at the Working Level.** The industry expressed an interest in seeing stronger communication at the working level during the RAI phase of the transition process. In particular, when RAI responses submitted by the industry are inadequate, the industry requested early notification from the NRC staff. The NRC staff was supportive of this concept. Further interaction is necessary to develop the framework.
3. **Process for Handling Emergent Issues.** Both the industry and NRC staff agreed that unexpected issues that emerge during the review have complicated the reviews and challenged the schedule. Further interaction is needed for the NRC to develop a process to address emergent issues.

By the end of the meeting, a series of forward-focused action items were established for the NRC staff and industry. The NRC staff will: 1) implement changes identified as the result of the internal lessons learned review, 2) improve communication of the status of RAIs, 3) set-up future meetings to discuss the areas requiring further interaction, and 4) improve the SE template. The industry, through NEI, will 1) implement changes discussed at the workshop, 2) develop a white paper on risk-informed compensatory measures and share the white paper with the NRC, 3) develop an improved “strawman” of the “freeze point” proposal, and 4) improve the LAR template. The NRC plans to hold another workshop after the first of the year with the goal of reaching a consensus on the three remaining issues requiring additional interaction with stakeholders.

#### Staff Actions to Broadly Address PRA Conservatism and Uncertainty

The NFPA 805 reviews, in addition to the voluntary adoption of other risk-informed regulations, have highlighted the need to develop methods to reduce conservatism and address uncertainties in a technically defensible manner. The NRC has established a Risk-Informed Steering Committee to provide strategic direction to facilitate staff efforts to develop and implement methods that improve realism in PRA results among various hazard groups, while appropriately identifying and considering associated uncertainties. The focus of the steering committee would not be limited to fire PRA, but would also include other hazards, such as seismic where there are large uncertainties. The Industry has developed a similar steering committee with similar objectives.