

FAQ Number 13-0069 FAQ Revision 2

FAQ Title Fire Brigade Member Qualifications

Plant: NEI NFPA 805 Task Force Date: January 13, 2014

Contact: Thomas Jutras Phone: 508-532-7136

Email: thj@epm-inc.com

Distribution: *(NEI Internal Use)*

805 TF FPWG RATF RIRWG BWROG PWROG

Purpose of FAQ:

A sufficient level of information is required to demonstrate compliance with NFPA 805 requirements for certain fire brigade members to have sufficient training and knowledge of nuclear safety systems.

Is this Interpretation of guidance? Yes / No

Proposed new guidance not in NEI 04-02? Yes / No

Details:

NEI 04-02 guidance needing interpretation (include section, paragraph, and line numbers as applicable):

Section 4.3.1, "Fundamental Fire Protection Program and Design Elements Transition Review" and Appendix K, "NFPA 805 Chapter 3 Clarifications".

Circumstances requiring guidance interpretation or new guidance:

Clarification of the NFPA 805 Chapter 3 requirement of Section 3.4.1(c), which requires certain fire brigade members to have sufficient training and knowledge of nuclear safety systems.

Detail contentious points if licensee and NRC have not reached consensus on the facts and circumstances:

None

Potentially relevant existing FAQ numbers:

None

Response Section:**Proposed resolution of FAQ and the basis for the proposal:**

Section 3.4.1 of NFPA 805 has the following requirement:

3.4.1 On-Site Fire-Fighting Capability.

- (c) *During every shift, the brigade leader and at least two brigade members shall have sufficient training and knowledge of nuclear safety systems to understand the effects of fire and fire suppressants on nuclear safety performance criteria.*

Exception to (c): Sufficient training and knowledge shall be permitted to be provided by an operations advisor dedicated to industrial fire brigade support.

In order to provide clarity for the language above regarding “sufficient training and knowledge of nuclear safety systems,” this term should be defined. NRC requests for additional information (RAIs) that have been transmitted to several transitioning non-pilot plants offer a method that is acceptable to the NRC, which is discussed below.

If appropriate, provide proposed rewording of guidance for inclusion in the next Revision:

Modify Appendix K to add the following clarification

=====

K.X NFPA 805 Section 3.4.1(c) (FAQ 13-0069)

Specific clarification for NFPA 805 section 3.4.1(c), from FAQ 13-0069;
To comply with the term “sufficient training and knowledge of nuclear safety systems to understand the effects of fire and fire suppressants on nuclear safety performance criteria,” where used in section 3.4.1(c), one acceptable method is as follows:

The brigade leader and at least two brigade members should have sufficient training in or knowledge of plant systems to understand the effects of fire and fire suppressants on safe shutdown capability. The brigade leader should be competent to assess the potential safety consequences of a fire and advise control room personnel. Such competence by the brigade leader may be evidenced by possession of an operator’s license or equivalent knowledge of plant systems.

At least two additional brigade members should have sufficient training in or knowledge of plant systems to understand the effects of fire and fire suppressants on safe shutdown capability. Training at the level of a Non-Licensed Operator (NLO) is a means

to demonstrate that a sufficient level of training and knowledge of nuclear safety systems is achieved for members not acting as brigade leader. The NLO training should cover portions of the plant with concentrations of NSCA equipment.

Another available option is to invoke NFPA 805 Section 3.1 for prior AHJ approval of the fire brigade member qualifications.