

April 11, 2014

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

FROM: Alayna Pearson, Fire Protection Engineer */RA/*
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE FEBRUARY 26, 2014, CATEGORY 2
MEETING REGARDING THE NATIONAL FIRE PROTECTION
ASSOCIATION STANDARD 805 FREQUENTLY ASKED
QUESTION PROCESS

On February 26, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with stakeholders and the public to discuss Frequently Asked Questions (FAQs) at plants that are adopting National Fire Protection Association Standard 805 (NFPA 805).

Industry stakeholders and the NRC staff discussed currently open FAQ 13-0069, which deals with fire brigade qualifications. The NRC provided comments and industry representatives stated that the comments were understood and acceptable. Technical agreement was reached, and the NRC staff stated that the closure memorandum would be forthcoming.

Industry stakeholders and the NRC staff discussed FAQ 12-0061, which deals with the plant change process. Technical agreement on the FAQ had already been reached, but an issue closely related to the subject of the FAQ was discussed. Representatives from the Nuclear Energy Institute (NEI) detailed an apparent discrepancy in the language of an NFPA 805 safety evaluation (SE), which implied that deterministic changes to a fire protection program (FPP) did not require a risk evaluation. The NRC staff stated that the SE language has been corrected to reflect the NFPA 805 requirement to complete a change evaluation for changes to the FPP. The staff also stated that deterministic compliance is one manner of meeting the requirements of the standard, and therefore a change to the FPP that is deterministic is also acceptable. Industry representatives acknowledged this, but also stated that a change may be deterministically compliant and impact risk; therefore the change evaluation is needed to determine the impact and compare strategies. The NRC staff proposed to complete the closure memorandum on the FAQ as currently written and have it reviewed by the Office of General Counsel. If any questions are raised or changes suggested during that review, then the FAQ will be further discussed in subsequent meetings.

Representatives from industry presented some operating experience on how the plant change process is currently being used at an 805 plant.

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There were no new FAQs introduced or discussed at the meeting. There were no public comments provided during the meeting.

Technical agreement has been reached on all open FAQs and no new FAQs were introduced therefore, the NRC staff and stakeholders agreed that the next FAQ meeting would be scheduled as needed.

The meeting handouts are available in the Agencywide Documents Access and Management System (ADAMS). FAQ 13-0068, Revision 4 is available at ADAMS Accession No. ML14059A423. NRC Staff comments on FAQ 13-0068, Revision 4 is available at ADAMS Accession No. ML14059A435. Industry slides on NFPA 805 Change Process ADAMS Accession No. ML14059A441. The NRC NFPA 805 FAQ status and history document is available at ML14059A447.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

There were no new FAQs introduced or discussed at the meeting. There were no public comments provided during the meeting.

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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

ADAMS Accession No.: ML14101A242

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| Date | 04/ 11 /14 | 04 / 11 /14 | |

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ENCLOSURE

**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
FREQUENTLY ASKED QUESTIONS PROCESS MEETING
LIST OF ATTENDEES**

February 26, 2014

U. S. Nuclear Regulatory Commission Staff

A. Klein
A. Pearson
B. Litkett
C. Moulton
D. Frumkin
G. Cooper
H. Barrett
J. Giitter
P. Lain
S. Dinsmore
S. Lee
S. Lyons
T. Dinh

Stakeholders

A. Ratchford (RDS)
B. Simril (TVA)
E. Kleinsorg (Hughes Associates)
J. Ertman (Duke)
J. MacIntyre (Duke)
J. Walker (Hughes Associates)
J. Stone (CENG/EXELON)
K. Bohlander (PNNL)*
K. Zee (ERIN)
M. Lilley (Constellation)
P. Mazzaferro (Hughes Associates)*
R. Layton (PNNL)*
R. Neild (Constellation)
R. Stewart (SCE&G)*
S. Collins (ERIN)
T. Shudak (NPPD)*
T. Swiecicki (Entergy)*
V. Anderson (NEI)
V. Rubano (NextEra)

* participated via phone

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