



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 29, 2014

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

FROM: Daniel M. Frumkin, Senior Fire Protection Engineer */RA/*  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 12, 2014, CATEGORY 2 MEETING  
REGARDING FIRE INDUCED CIRCUIT FAILURE ISSUES AND  
TASK INTERFACE AGREEMENT 2013-02

On May 12, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with stakeholders and the public to discuss issues related to fire induced circuit failures and Task Interface Agreement (TIA) 2013-02, "Single Spurious Assumptions for Braidwood and Byron Stations Safe-Shutdown Methodology," (Agencywide Document Access and Management System (ADAMS) Accession No. ML12194A500). A list of meeting attendees is enclosed with this memorandum. The agenda included discussion of industry proposed additions to Revision 2 of industry implementing guidance document Nuclear Energy Institute (NEI) 00-01, "Guidance for Post Fire Safe Shutdown Circuit Analysis," (ADAMS Accession No. ML091770265).

During the meeting the NRC staff provided an overview of TIA 2013-02. Industry stakeholders expressed a number of concerns regarding the TIA including:

- Was there sufficient interaction with the licensee prior to issuance?
- How would the NRC staff expect to treat a plant that is required to meet 10 CFR 50, Appendix R, Section III.G, that is licensed before 1979, but that has a safety evaluation approving consideration of only fire induced circuit failures that only result in a single spurious actuation?
- How would the TIA be used going forward, by the NRC staff and inspectors?
- Has the NRC considered the backfitting implications of the TIA on other plants with respect to fire protection?

The NRC staff presented its views on the concerns with the TIA. With respect to the concerns identified above, the staff indicated that they did contact the licensee who was the subject of the TIA, but since primary conclusion of the TIA was consistent with the licensee's position extensive discussion did not occur. The NRC staff acknowledged that the TIA does not provide information regarding plants licensed prior to 1979 that may have a "single spurious" approved licensing basis.

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The NRC staff indicated that the TIA would not be applied generically, and if information from the TIA is brought up during inspection, the licensee will have the opportunity to present and defend their plant specific licensing basis. With respect to backfitting, the NRC staff stated that the TIA was focused only on the two plants identified in the TIA, and that backfitting would have to be addressed individually for each plant because of the plant-specific nature of the licensing basis. The NRC's Office of General Council (OGC) representative acknowledged that NRC's backfitting determinations may be affected by the existence and scope of any NRC approvals of single spurious assumption at other plants.

The discussion concluded with representatives of NEI stating that they plan to prepare a letter providing the industry's legal interpretation of the information in the TIA.

The NRC staff informed the industry that now that TIA 2013-02 has been completed, the NRC staff will begin to focus on its review of NEI 00-01, Appendix J, (ADAMS Accession No. ML13294A603). NEI 00-01, Appendix J was submitted to the NRC staff for review and consideration for endorsement in a new revision of Regulatory Guide 1.189, "Fire Protection for Nuclear Power Plants," (ADAMS Accession No. ML092580550). The NRC currently endorses selected portions of NEI 00-01 in Regulatory Guide 1.189. The NRC staff informed meeting participants that the NRC staff will need to work internally to determine the short term and longer term technical issues that it expects to result from their review of Appendix J. The NRC staff indicated that it would reengage with industry stakeholders when this determination is completed, but this likely won't be completed for at least three months.

Industry stakeholders indicated that they plan to submit another appendix to NEI 00-01, Appendix I. Appendix I was described as including a high level discussion of the technical attributes and boundary conditions for the crediting of shorting switches to mitigate spurious actuations. Industry stakeholders indicated that they would be requesting NRC endorsement of Appendix I, which would likely involve a revision of Regulatory Guide 1.189.

There were no comments from members of the public.

Enclosure:  
As stated

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**ADAMS Accession No.: ML14133A649**

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**SUMMARY OF THE MAY 12, 2014, CATEGORY 2 MEETING REGARDING FIRE INDUCED  
CIRCUIT FAILURE ISSUES AND TASK INTERFACE AGREEMENT 2013-02  
LIST OF ATTENDEES**

May 12, 2014

U.S. NRC Staff (participated in person)	U.S. NRC Staff (participated via phone)
D. Frumkin H. Barrett H. Cruz B. Litkett C. Moulton G. Taylor R. Vettori	S. Alferink P. Braxton R. Daley J. Dixon M. Jeffers J. Mateychick G. Mizuno M.H. Salley T. Pennywell
Attendees (participated in person)	Attendees (participated via phone)
V. Anderson (NEI) P. Burns G. Cameron C. Chan S. Hutchins A. Jelalian E. Kleinsorg T. McComes C. Pragman A. Ratchford D. Shumaker B. Simril B. White M. Winsor J. Zimmerman	H. Beck D. Burke N. Chapman J. Conly F. DePeralta T. Gorman J. Hicks B. Ledger A. Lindeman R. Kalantari M. Kammer D. Manteufel J. Martin D. Murray D. Raleigh R. Rochelle D. Scoziello G. Stewart C. Turner E. Turner K. Zee

ENCLOSURE