

August 11, 2014

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

Hossein Hamzehee, Chief
PRA Licensing 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 JULY 1, 2014, CATEGORY 2 MEETING
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805: NUCLEAR REGULATORY
COMMISSION/NUCLEAR ENERGY INSTITUTE MANAGEMENT
DISCUSSION

On July 1, 2014, the U.S. Nuclear Regulatory Commission (NRC) Division of Risk Assessment (DRA) management held a meeting with Nuclear Energy Institute (NEI) management to discuss questions requiring management attention related to National Fire Protection Association Standard 805 (NFPA 805).

The purpose of the meetings is to discuss substantive issues related to NFPA 805. Moving forward the meetings will be face-to-face and will occur less frequently. In addition, topics for discussion will be communicated prior to the scheduled meeting.

The participants discussed, at a high level, the following topics:

- Audits
 - NRC staff stated that the first audit to be conducted using the revised audit process was held in June 2014. Overall, the audit was more efficient. Once additional audits are conducted using the same process, the staff will identify any other efficiencies or lessons learned. The staff also stated that although the number of requests for additional information (RAI) are not being tracked, the staff is working to minimize the number of second round RAIs.

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- Research
 - NRC staff, from the Office of Nuclear Regulatory Research (RES), gave a high level overview of the status of some of their activities. The electrical cabinet heat release rate testing is complete and the next step is for the methods panel to meet in the coming months. The incipient detection test report is being compiled and once complete, will be shared with the Office of Nuclear Reactor Regulation (NRR) for comment. High energy arcing fault testing is ongoing as well as the activities related to main control room abandonment and human reliability analysis. NUREG/CR-7150, Vols. 1 and 2 – Joint Assessment of cable Damage and Quantification of Effects from Fire (JACQUE-FIRE), have been published and volume 3 is in development. Technical issues have been resolved on the fire modeling verification and validation project and the report is now with the technical editors. Training courses on fire probabilistic risk assessment (PRA) will be offered in August and September 2014, at NRC Headquarters.
- Other items of concern
 - NEI representatives described a scenario where an NFPA 805 application has been approved, and a subsequent update to the PRA reveals additional margin, that makes a committed modification unnecessary. They then inquired if a mechanism exists, other than the license amendment process, that allows the licensee to avoid completing the modification. The NRC staff stated that they were open to looking at flexibilities related to this issue and that licensing and general counsel input would be needed. NEI representatives stated that options were being explored, and would be shared at future NFPA 805 frequently asked questions (FAQ) process meetings.
 - NEI representatives inquired if the questions and concerns related to the use of gas powered fans will spread outside of the NFPA 805 realm. The NRC staff suggested that the concerns be discussed during future FAQ meetings, to accommodate more detailed technical discussions.
 - NEI representatives expressed a concern with the timeliness of billing fees for NFPA 805, and inquired if there was a way to know, and communicate that all billing related to the reviews will be done once the safety evaluation is completed. The NRC staff stated that they understood the concern and will review it.

Participants agreed that the next meeting would be scheduled at a later date.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

- Research

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**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
NRC/NEI MANAGEMENT DISCUSSION
LIST OF ATTENDEES**

July 1, 2014

U. S. Nuclear Regulatory Commission Staff	Stakeholders
A. Klein	A. Lindeman (EPRI)*
A. Pearson	A. Ratchford (RDS)*
D. Frumkin	B. Fosdick (SWRI)
D. McMillan	B. Simril (TVA)*
G. Taylor	E. Flick (Constellation)*
H. Hamzehee	E. Kleinsorg (Hughes)*
J. Giitter	G. Harris (Ameren)*
J. Robinson	J. Helfand (SWRI)
M. Salley	L. Abbott (FPL)*
N. Melly	M. McLachlan (Ameren)*
P. Lain	M. Tschiltz (NEI)*
R. Correia	T. Swiecicki (Entergy)*
S. Lee	V. Anderson (NEI)*
S. Obadina	

* participated via phone

ENCLOSURE