

October 7, 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 SEPTEMBER 2, 2014, CATEGORY 2  
MEETING REGARDING NATIONAL FIRE PROTECTION  
ASSOCIATION STANDARD 805: NUCLEAR REGULATORY  
COMMISSION/NUCLEAR ENERGY INSTITUTE MANAGEMENT  
DISCUSSION

On September 2, 2014, management from the U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Reactor Regulation (NRR) Division of Risk Assessment (DRA) with support from the Office of Nuclear Regulatory Research (RES) held a meeting with Nuclear Energy Institute (NEI) management to discuss topics requiring management attention related to National Fire Protection Association Standard 805 (NFPA 805).

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

- The September 18, 2014 Advisory Committee on Reactor Safeguards Subcommittee meeting on NFPA 805 will include presentations on the status of the reviews and a summary of the related technical challenges. Both NRC and industry representatives will participate.
- License Amendment Request (LAR) Reviews and Safety Evaluation (SE) Issuance
  - The NRC staff stated that in addition to the four SEs already issued in calendar year (CY) 2014, another four SEs are estimated to be completed by the end of the year. The staff also stated that the bulk of SEs is planned for issuance in CY 2015.
  - NEI representatives inquired about observed challenges to the review schedule. The NRC staff stated that schedule challenges are plant specific, and may be related to, for example, the quality of responses to requests for additional information (RAIs) or making last minute changes to a LAR during the review.

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- Audit Process
  - NEI representatives discussed an industry perspective on the new NFPA 805 site audit process, including best practices, notable improvements and areas for adjustment. Regarding RAIs, NEI representatives stated that there is value in receiving them as drafts prior to the audit. When the RAIs are in draft, necessary refinements can be made during the audit. The NRC staff agreed, and stated that going forward the RAIs will not be finalized until end of the audit.
  - NEI representatives inquired if the new audit process minimizes the need for second and third rounds of RAIs. The NRC stated that with the new process, the staff is working toward minimizing additional rounds of RAIs; but that there is still potential for follow-up RAIs depending on the quality of responses from the licensees.
  
- Fire Frequently Asked Questions (FAQ)
  - NEI representatives stated that progress has been made on certain aspects of the FAQ on well-sealed electrical cabinets. To make further progress, NEI stated that the scope of the FAQ would be changed to include all motor control cabinets, and information developed through acceptable approaches would be used to support the conclusions in the FAQ.
  - NEI representatives stated that with more plants receiving their SEs, the FAQ on the post-transition change process is urgent, and inquired about the status of this FAQ. NRC representatives stated that the FAQ was in the internal concurrence process, and that an update will be provided at the next FAQ meeting.
  
- Process for changes to Modifications
  - NEI representatives stated that another mechanism, other than submission of a separate LAR, by which a licensee may make changes to committed modifications, after the SE is issued, would be beneficial. In the event a licensee determines that some of their PRA assumptions were overly conservative and more realistic values become available, a modification that was originally important for risk reduction, may no longer be needed. NEI representatives proposed a change to the NFPA 805 license condition that would provide a licensee the opportunity to re-evaluate modifications that are no longer important for risk reduction. The NRC staff stated that they would need to discuss this with the Office of General Counsel.
  
- Research
  - An overview of the status of recent research activities was provided. The electrical cabinet heat release rate (HRR) testing is complete and the methods panel is scheduled to meet in mid September 2014. The draft incipient fire detection system test report is being reviewed by the NRC staff; the 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, Vol. 3– Joint Assessment of cable Damage and Quantification of Effects from Fire (JACQUE-FIRE) is under development. The fire modeling verification and validation supplement is scheduled for public comment in October 2014. Training courses on fire probabilistic risk assessment (PRA) will be offered in September 2014 at NRC Headquarters.
  - NEI representatives inquired about expediting the HRR report, so that licensees may use the results as soon as possible. They also stated that interim guidance from the staff would be helpful. The NRC staff stated that they would explore the use of interim guidance for this issue.

- Other items
  - NRC representatives stated that the freeze point white paper will be completed by the end of 2014. In the interim, a licensee could use the concept, but should inform the staff in advance.
  - NRC representatives stated that clarification on how reactor coolant pump shutdown seals are being reviewed with respect to NFPA 805 was provided to the Pressurized Water Reactor Owner's Group.
  - NEI representatives stated that a Risk Informed Steering Committee meeting was scheduled in the coming weeks, and PRA methods that can be used for various applications, including seismic, would be discussed.

During the public comment period, a question was asked regarding when the response clock for RAIs started. The NRC staff responded that the clock starts on the date of the audit exit meeting.

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

Meeting handouts are available in the Agencywide Documents Access and Management System (ADAMS). Industry slides on the new audit process can be found at ML14245A590. The NFPA 805 review schedule can be found at ML14245A585.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:  
As stated

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As stated

DISTRIBUTION:

DRA R/F      AKlein              PLain              APearson      RDaley, RIII      MKing, RII  
CMoulton      HBarrett              HHamzehee      GMiller, RIV      JRogge, RI

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

September 2, 2014

**U. S. Nuclear Regulatory Commission Staff      Stakeholders**

A. Pearson  
B. Miller  
H. Hamzehee  
J. Giitter  
J. Robinson  
M. Salley  
P. Madden  
S. Lee

A. Hazelhoff (Entergy)\*  
A. Lindeman (EPRI)  
A. Ratchford (RDS)\*  
E. Flick (Exelon)  
E. Kleinsorg (Hughes)\*  
J. Bergman (Curtiss Wright/Scientech)  
J. Branum (Southern Company)\*  
J. Ertman (Duke)  
L. Abbott (FPL)\*  
P. Harden (First Energy)  
R. Neild (Exelon)\*  
S. Dolley (Platts)\*  
V. Anderson (NEI)

\* participated via phone

ENCLOSURE