

FAQ Number 14-0073 FAQ Revision DRAFT

FAQ Title Acceptable Uses of Fuel Fired Equipment

Plant: Palisades Date: August 18, 2014
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Purpose of FAQ:

FAQ provides clarification on the acceptable use of fuel fired equipment relative to NRC NFPA 805 RAI's, NFPA 805 Section 3.3.1.3.4, and compliance with GDC 3.

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):

NRC NFPA 805 RAI's at several transitioning plants have challenged the use of fuel fired equipment in general whereas NFPA 805 Section 3.3.1.3.4 specifically prohibits fuel fired heaters only. There has also been reference to fuel fired equipment as not meeting GDC 3 whereas FAQ 07-0032 previously clarified that satisfying 10 CFR 50.48(c) will satisfy 10 CFR 50.48(a) and GDC 3.

If satisfying 10 CFR 50.48(c) by meeting NFPA 805 satisfies GDC 3 and NFPA 805 does not prohibit the use of fuel fired equipment other than fuel fired heaters, then the use of fuel fired equipment other than fuel fired heaters should not violate GDC 3. There is a lack of clarity in interpreting the guidance documents and associated approved FAQ's related to the use of fuel fired equipment and hence a difference of interpretation in implementing the regulatory requirements related to this type of equipment.

Circumstances requiring guidance interpretation or new guidance:

Clarification on the interpretation of the regulatory guidance documents, including approved FAQ's, related to the use of fuel fired equipment is needed. The lack of clarity in interpreting the regulatory guidance documents has led to uncertainty in satisfying the

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requirements as part of the NFPA 805 approval process and will continue to be an issue as part of future fire protection inspections.

NFPA 805 Section 3.3.1.3.4 specifically prohibits fuel fired heaters but does not mention other fuel fired equipment. The NRC NFPA RAI's have gone beyond the prohibition of fuel fired heaters and made the issue more generic to fuel fired equipment. This appears to go beyond the intent of NFPA 805 and licensees are struggling with how to interpret the regulatory guidance documents, including approved FAQ's, as currently written. For example: there are crane bays that periodically contain fuel fired vehicles, there are plants that have permanently installed fuel fired backup equipment which is part of the approved plant design, there are fuel fired man-lifts periodically utilized, etc. The features mentioned above are a few examples of fuel fired equipment relied upon to support safe reliable nuclear plant operation and are examples that meet the literal requirements but do not meet the more generic interpretation prohibiting "fuel fired equipment".

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

None

Potentially relevant existing FAQ numbers: FAQ 07-0032, Clarification of 10 CFR 50.48(c), 50.48(a), and GDC 3

Response Section:

Proposed resolution of FAQ and the basis for the proposal:

NFPA 805 Section 3.3.1.3.4 already specifically prohibits the use of fuel fired heaters. FAQ 07-0032 previously approved provided clarification that satisfying 10 CFR 50.48(c) will satisfy 10 CFR 50.48(a) and GDC 3. The existing approved regulatory guidance documents do not prohibit the use of all fuel fired equipment.

Proposed resolution is to follow the previously approved and accepted regulatory guidance documents allowing plants to utilize the most appropriate prudent approach to plant operation within the constraints of those guidance documents. This includes control of combustibles which is intended to provide a level of defense to prevent fires and the impact of a fire and not prohibit the use of all combustibles.

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

None