

## **NRR-PMDAPEm Resource**

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**From:** George, Andrea  
**Sent:** Friday, December 05, 2014 9:29 AM  
**To:** 'BICE, DAVID B (ANO)'  
**Cc:** Wall, Scott; Robinson, Jay  
**Subject:** ANO-2 NFPA-805 LAR Revised License Condition Necessitates Updated Enclosures 2 and 3 to Original LAR  
**Attachments:** ANO2 NFPA 805 LC.docx

Good morning Mr. Bice,

As we discussed on the phone, in your original LAR, Attachments M and N, referenced Enclosures 2 and 3 for the marked up and clean versions of TS and License Condition changes. Since the license condition language has been revised since the original LAR (as attached), the NRC staff would need that new language submitted on the docket from the licensee in order to complete review and issue the amendment.

In the attached document, please note that the highlighted December date should be filled in with the document date of the supplement you're sending in.

Please let me know of any questions.

Andrea George

**Hearing Identifier:** NRR\_PMDA  
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**From:** George, Andrea

**Created By:** Andrea.George@nrc.gov

**Recipients:**  
"Wall, Scott" <Scott.Wall@nrc.gov>  
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## Fire Protection Program

Entergy Operations, Inc. shall implement and maintain in effect all provisions of the approved fire protection program that complies with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated December 17, 2012, and supplements dated November 7, 2013, December 4, 2013, January 6, 2014, May 22, 2014, June 30, 2014, August 7, 2014, September 24, 2014, and December XX, 2014, as approved in the SE dated XX/XX/XX. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

### Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at ANO-2. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than  $1 \times 10^{-7}$ /year (yr) for CDF and less than  $1 \times 10^{-8}$ /yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

### Other Changes that May Be Made Without Prior NRC Approval

- 1) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not

affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard.

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- "Fire Alarm and Detection Systems" (Section 3.8);
- "Automatic and Manual Water-Based Fire Suppression Systems" (Section 3.9);
- "Gaseous Fire Suppression Systems" (Section 3.10); and
- "Passive Fire Protection Features" (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2) Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC SE dated XX/XX/XX to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

Transition License Conditions

- 1) Before achieving full compliance with 10 CFR 50.48(c), as specified by 2) below, risk informed changes to Entergy Operations, Inc. fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2) above.
- 2) The licensee shall implement the modifications to its facility, as described in Table S-1, "Plant Modifications," Attachment 5, of Entergy Operations, Inc. letter 2CAN081401, dated August 7, 2014, prior to startup from the second refueling outage following issuance of the Safety Evaluation. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
- 3) The licensee shall complete the implementation items as listed in Table S-2, "Implementation Items," Attachment, of Entergy Operations, Inc. letter

2CAN091402, dated September 24, 2014, within six months after issuance of the Safety Evaluation.