

NRR-PMDAPEm Resource

From: Saba, Farideh
Sent: Tuesday, March 24, 2015 6:46 PM
To: ken.frehafer@fpl.com; Sciscente, Richard (Richard.Sciscente@fpl.com); Cross, William (WILLIAM.CROSS@fpl.com)
Cc: Lewis, Atanya (Atanya.Lewis@fpl.com); eric.katzman@fpl.com; Miller, Barry
Subject: Final PSL PRA RAI on III G 3 areas.docx
Attachments: Final PSL PRA RAI on III G 3 areas.docx
Importance: High

Bill, Ken, and Richard,

Attached is the finalized PRA RAI 11.c.02.01 regarding transition to NFPA 805 LAR for St. Lucie. The information is requested in this follow up RAI was provided in the FPL's presentation slides for the February 19, 2015 public meeting. Therefore, the staff is asking for your response ASAP for the staff to be able to complete its review of the LAR (not later than 30 days from the date of this email).

Thank you,

Farideh

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PRA RAI 11.c.02.01

The response to PRA RAI 11.c.02 implies that there are numerous steps and assumptions involved in estimating the change in risk associated with the cable spreading room but does not clearly describe all the steps and the assumptions. Most of the information requested below was provided in the slides and discussed with the staff during the public meeting on February 19, 2015 (ADAMs Accession Number 15063A347). Please provide the following information.

- a. Identify the criteria for applying this type of change in risk estimate to a fire area. Is this method used for any area other than the cable spreading room?
- b. Describe how variances from deterministic requirements (VFDRs) in the cable spreading room are defined and identified.
- c. Clarify whether the fire frequency in this area is the same for the variant and the complaint plants (i.e., no changes are made to the detection and suppression likelihoods between the variant and compliant plant models). If different, describe the difference.
- d. Clarify whether it is possible to shutdown from the ASP after trying, and failing, to shutdown from the MCR.
- e. Describe how the complaint case CCDP/CLERP is estimated for the three cases discussed during the public meeting (i.e., small fire, more severe fire, and hot gas layer fire).
- f. Describe how the variant case CCDP/CLERP is estimated for the three cases discussed during the public meeting (i.e., small fire, more severe fire, and hot gas layer fire).
- g. Describe how the change-in-risk estimate are developed for the three cases discussed during the public meeting (i.e., small fire, more severe fire, and hot gas layer fire)..
- h. Discuss why the change in risk estimates are reasonable or conservative for the three cases discussed during the public meeting (i.e., small fire, more severe fire, and hot gas layer fire). This discussion should include how the impact of VFDRs within the cable spreading room are included in the calculations.