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March 31, 2015

Ms. Cindy K. Bladey  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments on Draft NUREG-1824, Supplement 1, Verification and Validation of Selected Fire Models for Nuclear Power Plant Applications (Docket ID NRC-2014-0206)

**Project Number: 689**

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to provide comments on the Draft NUREG-1824, Supplement 1, "Verification and Validation of Selected Fire Models for Nuclear Power Plant Applications" (Docket ID NRC-2014-0276).  
*0206*

The purpose of this Draft NUREG is to document the results of verification and validation of fire modeling codes commonly used in nuclear power plant applications. This work supports key fire protection regulatory initiatives, such as the transition to National Fire Protection Association Standard 805, and it is critical that the technical content be clear and complete. While the document is quite comprehensive, NEI has several comments on the technical content, which are included as an attachment to this letter. Most notably, the draft NUREG would be more complete if flame height were more explicitly addressed in the discussions on uncertainty and the summary of the validation results.

We appreciate your consideration of these comments. If you have any questions or require additional information, please contact me.

Sincerely,

Victoria K. Anderson

<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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Ms. Cindy K. Bladey

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Attachment

c: Mr. Mark Henry Salley, RES/DRA/FRB, NRC  
Mr. David Stroup, RES/DRA/FRB, NRC

**Attachment: Specific Comments on Draft NUREG-1824, Supplement 1, Verification and Validation of Selected Fire Models for Nuclear Power Plant Applications**

Section/Page	Comment
Page 3-32, Table 3-2	The parameters for the NIST Smoke-Alarm experiments are not included in this table (See Section 3.1.9).
Page 3-32, Table 3-2	The W/H and L/H parameters for the iBMB experiment should be the lowest range for the aspect ratio in Table 3-3.
Page 3-33, Table 3-3	The compartment aspect ratio does not align with that in Table 3-2.
Page 3-34, Section 3.3.1	The discussion on uncertainty should be revised to address flame height correlation.
Page 4-5, Section 4.2.6	"Heat release rate" is misspelled in the 3 <sup>rd</sup> bullet from the bottom of the page.
Page 5-1, Chapter 5	Flame height should be addressed in the validation results summary.