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Determining the Effectiveness, Limitations, and Operator Response for Very Early Warning Fire Detection Systems in Nuclear Facilities

Comment On: NRC-2015-0112-0001

Determining the Effectiveness, Limitations, and Operator Response for Very Early Warning Fire Detection Systems in Nuclear Facilities (DELORES-VEWFIRE); Draft NUREG for Comment

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Submitter Information

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General Comment

See attached file(s)

Attachments

NFPA Comments on NRC-2015-0112

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SUNSI Review Complete

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Add= *ef. J. Taylor (gdt)*



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Docket No. NRC-2015-0112

RE: Draft NUREG-2180; request for comment

Determining the Effectiveness, Limitations, and Operator Response for Very Early Warning Fire Detection Systems in Nuclear Facilities (DELORES-VEWFIRE)

NFPA commends the Nuclear Regulatory Commission's (NRC's) efforts through this draft to gather comments regarding the possible NUREG for DELORES-VEWFIRE. Through its consensus standards on fire detection systems and nuclear power plant fire protection, NFPA supports the overall goal of improving safety of operation for these facilities. NFPA published documents related to this draft include standards for overall performance, fire detection systems, and specific protection applications (NFPA 805, *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants*; NFPA 72, *National Fire Alarm and Signaling Code*; and NFPA 76, *Standard for Fire Protection of Telecommunications Facilities*, respectively). It should be noted that NFPA interacts frequently with the NRC, and that members of the NRC staff serve on the Fire Protection for Nuclear Facilities Technical Committee.

The comments below focus on those areas related to NFPA documents. As a preliminary matter though, it should be noted that NFPA codes and standards are minimum safety standards, addressing the minimum level of safety needed for the scenarios within their respective scopes. Both NFPA 72 and NFPA 76, cited frequently in the draft NUREG, state that neither is "intended to prevent the use of calculation methods, test methods, systems, methods, or devices of superior quality, strength, fire resistance, effectiveness, durability, and safety as alternatives to those required by this standard, provided technical documentation is submitted to the authority having jurisdiction to demonstrate equivalency, and the system, method, or device is approved for the intended purpose." Particularly where scenarios or processes may be beyond the scope of the document, or where the NRC is seeking more stringent levels of safety, the NUREG should consider other sources and methods.

1. The draft NUREG frequently compares the requirements in NFPA 72 and NFPA 76. NFPA 72 is a code written for the installation of fire alarms and signaling for occupant safety. NFPA 76 is a standard written for telecommunications facilities for the protection of the equipment in those facilities. These represent two different protection goals and should not be directly compared to one another.
2. Page 2-1 of the draft NUREG references "NFPA standard 76 'Fire Protection of Telecommunication Facilities.'" The correct reference is NFPA 76, "Standard for Fire Protection of Telecommunication Facilities."
3. Page 2-6 of the draft NUREG references the "NFPA Glossary of Terms" for the listed definitions. We would recommend referencing these definitions from the document that most closely matches the scope of the draft NUREG's application. The NFPA Glossary of Terms is comprised of definitions

taken from various documents to assist in identifying similarities and differences between commonly used terms. The Glossary of Terms is not a source document and may not be updated as frequently as the source documents.

4. Page 2-22 of the draft NUREG states that NFPA 76 requires the use of NFPA 72 for performance based applications. NFPA 76 however only requires the use of NFPA 72 for prescriptive based applications.
5. Page 4-2 of the draft NUREG states that the requirements cited are from "NFPA 72, 13th edition." NFPA publications reference specific years, not edition numbers. The current edition of NFPA 72 is the 2013 edition.
6. Page 12-16, item number three, of the draft NUREG references Annex A of NFPA 76. The likely intended reference is Annex B, not Annex A.
7. Page 12-16, item number five, of the draft NUREG references a requirement from NFPA 76 for cloud chamber alerts. NFPA 76 does not contain this requirement.

NFPA appreciates this opportunity to provide comments to this draft NUREG. If there are questions that arise from our comments, please feel free to contact me and I can direct them to the appropriate member of the NFPA technical staff as needed.

Sincerely,

Meghan Housewright
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National Fire Protection Association