

December 3, 2015

Mr. Michael D. Tschiltz
Director, Risk Assessment
Nuclear Energy Institute
1201 F St., NW, Suite 1100
Washington, DC 20004-1218

SUBJECT: RESPONSE TO OCTOBER 28, 2015, LETTER REGARDING THE AVAILABILITY OF NUREG-2178, "REFINING AND CHARACTERIZING HEAT RELEASE RATES FROM ELECTRICAL ENCLOSURES DURING FIRE (RACHELLE-FIRE), VOLUME 1: PEAK HEAT RELEASE RATES AND EFFECT OF OBSTRUCTED PLUME"

Dear Mr. Tschiltz:

The U.S. Nuclear Regulatory Commission's (NRC) Office of Nuclear Reactor Regulation (NRR) has reviewed your letter dated October 28, 2015, available in the NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML15307A193, regarding NRR's October 1, 2015 (ADAMS Accession No. ML15261A713), letter that expressed NRR's regulatory expectations from licensees choosing to apply information available in NRC technical report designation (NUREG) NUREG-2178, "Refining and Characterizing Heat Release Rates from Electrical Enclosures During Fire (RACHELLE-FIRE), Volume 1: Peak Heat Release Rates and Effect of Obstructed Plume" (ADAMS Accession No. ML15266A516), which was developed by the NRC's Office of Nuclear Regulatory Research.

Your October 28 letter offered interpretations of two statements in the October 1 letter. The first statement dealt with the expectation that licensees provide an acceptable level of detail and justification in their submittals to allow the staff to make an independent determination of acceptability based on the technical merits and completeness of a submittal. This is an expectation for any license amendment request. The staff agrees with the industry interpretation that the electrical enclosures addressed in NUREG-2178 do not require additional justification in individual submittals beyond that already noted in the NUREG.

The second statement dealt with the application of the heat release rate (HRR) information in NUREG-2178. It is not the NRC's expectation that licensees should open and inspect the internals of a cabinet prior to using a particular HRR value in their analyses. However, consistent with the guidance in NUREG-2178, the NRC does expect licensees to utilize available plant information to verify that the cabinets present in their facilities, and used in the probabilistic risk analysis (PRA), are physically consistent (e.g., size, function, etc.) with those represented by the corresponding cabinets in the NUREG. Furthermore, the staff agrees with the industry interpretation regarding situations where the cabinet condition is discovered to differ

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substantially from that modeled in the PRA. In that situation, it is the NRC's expectation that licensees will take appropriate corrective actions to reconcile any potential errors (e.g., in accordance with National Fire Protection Association Standard 805, Section 2.7.2). The staff also agrees that there is already a process in place to address this situation.

Hopefully, this letter will clear up any confusion that may have been created by my October 1 letter.

Sincerely,
/RA/

Joseph G. Giitter, Director
Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

cc: S. Lewis, EPRI

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ADAMS Letter Accession No.: ML15322A172

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