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MEMORANDUM FOR: AFPB Files

FROM: Alexander R. Klein, Branch Chief */RA/*  
Fire Protection Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: CLOSE-OUT OF NATIONAL FIRE PROTECTION ASSOCIATION  
805 FAQ 14-0070 REGARDING USE OF NON-FIRE TREATED  
WOOD

The Nuclear Energy Institute through its National Fire Protection Association (NFPA) 805 Task Force (Task Force), has been pursuing a frequently asked question (FAQ) regarding the controls related to the use of wood in the power block of nuclear power plant licensees that adopt NFPA 805. The Task Force submitted Revision 0b of FAQ 14-0070 (Agency-wide Documents Access and Management System (ADAMS) Accession No. ML14191B262) on July 10, 2014. Subsequently, technical exchanges took place between the Task Force and Nuclear Regulatory Commission (NRC) staff, documented in References 3 and 5, and concluded with FAQ Revision 0g, dated July 29, 2015, which was received by the NRC on November 18, 2015 (ADAMS Accession No. ML15335A159).

**BACKGROUND**

NFPA 805, Chapter 3, Section 3.3.1.2(1), Control of Combustible Materials, states that, "Wood used within the power block shall be listed pressure-impregnated [treated] or coated with a listed fire-retardant application." The section includes an exception for cribbing timbers six by six inches or larger. Task Force members indicated the language in the standard would prohibit the use of wood that is untreated or uncoated.

**DISCUSSION**

The information provided in FAQ 14-0070, Revision 0g states that NFPA 805, Section 3.3.1.2(1) specifically applies to use of wood during maintenance, modification, or refueling operations such as ramps, laydown blocks, and scaffolding.

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The FAQ clarifies that untreated or uncoated wood is acceptable for use when other portions of Section 3.3.1.2 are met. For example, untreated or uncoated wood waste, debris, scrap and packing material, is acceptable if the requirements of 3.3.1.2(3) are met. Similarly, untreated or uncoated wood is acceptable in combustible storage and staging areas if the requirements of 3.3.1.2(4) are met.

The FAQ further clarifies that the use of untreated and uncoated wood in the form of small hand tools, maintenance equipment, etc., are acceptable when the materials are limited and controlled by the plant's transient and combustible control program. Also, compensatory measures will be imposed when necessary.

### **CONCLUSION**

The staff has reviewed the proposed clarification to NFPA 805 Chapter 3 requirement of NFPA 805, Section 3.3.1.2 as presented in FAQ 13-0070, Revision 0g. Incorporation of the FAQ into Nuclear Energy Institute, NEI 04-02, "Guidance for Implementing a Risk Informed, Performance-Based Fire Protection Program Under 10CFR 50.48 (c)," would not prevent continued endorsement of NEI 04-02. In accordance with RIS 2007-19, the guidance in this FAQ is acceptable for use by licensees in transition. The final endorsement of this FAQ will be addressed by the next revision to Regulatory Guide 1.205.

### **REFERENCES**

1. Revision 0b to FAQ, July 10, 2014, ADAMS Accession No. ML14191B262
2. NRC Staff Response to Revision 0b, December 2, 2014, ADAMS Accession No. ML14336A078
3. Revision 0e to FAQ, March 11, 2015, ADAMS Accession No. ML15126A260
4. NRC Staff Response to Revision 0e, May 26, 2015, ML15146A167
5. Revision 0f to FAQ, July 21, 2015, ADAMS Accession No. ML15203A019
6. NRC Staff Response to Revision 0f, August 4, 2015 ADAMS Accession No. ML15208A395
7. Revision 0g, to FAQ, November 18, 2015, Accession No. ML15335A159
8. NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition (available through the Public Document Room or NFPA)
9. Regulatory Guide 1.205, Risk-informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants, ADAMS Accession No. ML061100174

10. NRC Regulatory Information Summary 2007-19, Process for Communicating Clarifications of Staff Positions Provided in Regulatory Guide 1.205 Concerning Issues Identified During The Pilot Application of National Fire Protection Association Standard 805, ADAMS Accession No. ML071590227
11. Nuclear Energy Institute, NEI 04-02, Guidance for Implementing a Risk Informed, Performance-Based Fire Protection Program Under 10CFR 50.48 (c), Revision 2, Washington, DC, April 2008, ADAMS Accession No. ML081130188

10. NRC Regulatory Information Summary 2007-19, Process for Communicating Clarifications of Staff Positions Provided in Regulatory Guide 1.205 Concerning Issues Identified During The Pilot Application of National Fire Protection Association Standard 805, ADAMS Accession No. ML071590227
11. Nuclear Energy Institute, NEI 04-02, Guidance for Implementing a Risk Informed, Performance-Based Fire Protection Program Under 10CFR 50.48 (c), Revision 2, Washington, DC, April 2008, ADAMS Accession No. ML081130188

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