

## Frumkin, Daniel

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**From:** Frumkin, Daniel  
**Sent:** Wednesday, April 20, 2016 2:27 PM  
**To:** ANDERSON, Victoria (vka@nei.org)  
**Cc:** Hyslop, JS; Rosenberg, Stacey; Barrett, Harold; Casto, Greg; Miller, Barry  
**Subject:** For May 3, 2016 FAQ Meeting - NFPA 805 PRA Update FAQ 16-0076  
**Attachments:** NFPA 805 PRA Update FAQ 16-0076 4\_20\_16 with NRC comments.doc

Victoria,

Attached are NRC comments on FAQ 16-0076 for discussion during the May 3, 2016, Public FAQ Teleconference.

This document will be added to public ADAMS and will be linked to the meeting announcement.

Let me know if you have any questions,

Dan

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FAQ Number 16-0076 FAQ Revision 0

FAQ Title NFPA 805 Fire PRA Update Process

Plant: NEI NFPA 805 Task Force Date: 2-25-2016

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Distribution: *(NEI Internal Use)*

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**Purpose of FAQ:**

To articulate the process for update of Fire PRAs supporting NFPA 805 plants, to reflect new methods and data, as appropriate.

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Is this Interpretation of guidance?  Yes /No

Proposed new guidance not in NEI 04-02? Yes/ No

**Commented [HJ1]:** Proposed guidance is not in 04-02, contrary to "not..no." Double negative is confusing.

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**Details:**

The NRC and industry have had discussions regarding the schedule for integration of new data or methods, such as heat release rates and ignition frequencies, into licensee Fire PRAs. The industry has proposed that this be done via the normal maintenance and update process as the PRA Configuration Control program describes. This Program will ensure that such new information is integrated as appropriate.

**Circumstances requiring guidance interpretation or new guidance:**

As additional methods and data for Fire PRA become available for integration into licensee models, it is important that the NRC and licensees have a mutual understanding of when this information will be considered for inclusion in a licensee's PRA to support regulatory stability and predictability.

**Detail contentious points if licensee and NRC have not reached consensus on the facts and circumstances:**

N/A

**Potentially relevant existing FAQ numbers:**

None

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**Response Section:**

**Proposed resolution of FAQ and the basis for the proposal:**

All licensees transitioning to NFPA 805 support their applications with a Fire PRA that is peer reviewed using NRC-endorsed standards and guidance. This peer review involves, in addition to a thorough technical review, a review of the PRA maintenance procedures against the requirements in the NRC-endorsed ASME/ANS PRA Standard. The results of the peer review, including facts and observations related to the PRA maintenance procedures, are available for NRC review, and are closely evaluated during the NRC NFPA 805 audit. Any new information relevant to the licensee's Fire PRA, including new methods or data, is introduced into the PRA using the licensee's process. Several key aspects of this maintenance and update process for updates and upgrades are listed below:

- While undergoing a PRA update, a utility's "cutoff" time for considering new data varies from 6 months prior to 6 months after the start of the PRA update.
- Generally speaking, new data updates could take up to 8 months depending on the scope.
- In undergoing a PRA upgrade, the "cutoff" time required for considering new methods is anywhere from the beginning of the upgrade period to 6 months after the start of the PRA upgrade.
- The time required for a PRA upgrade can be anywhere from a few months to a few years depending on the complexity of the upgrade.
- The scope of sensitivity studies largely depend on the scope of the upgrades. Because of this, changes can take anywhere from a few days to many months.
- The time for completion with changes to several new methods or data incorporated into an update/upgrade/sensitivity study involves a small delay (up to 6 months). If a smaller delay occurs, it is usually the result of a large increase in devotion of person-hours towards it.
- For interim and periodic model updates, maintenance and update procedures use criteria of a greater than 10% change (increase or decrease) in the CDF or greater than anywhere from a 1% to 20% change (increase or decrease) in the LERF. The licensee's periodic update process to evaluate the impact of a change and potentially incorporate it in the PRA typically takes place every 3-5 years.

• These update processes ensure that new information is evaluated for inclusion in PRAs when there is a measurable impact on the results and applications. Should the impact of a new method or data need to be evaluated for a risk informed application in a shorter time that indicated above, an assessment of the impact commensurate with the shorter time available will be performed. Although not necessarily as robust, such an evaluation will still need to be a realistic representation of the risk, or suitably conservative.

Commented [HJ2]: Not sure what this bullet means.

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