UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 16, 2016

MEMORANDUM TO: Greg A. Casto, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Daniel M. Frumkin, Senior Fire Protection Engineer ***/RA/***
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 3, 2016, CATEGORY 2 MEETING REGARDING THE NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805 FREQUENTLY ASKED QUESTION PROCESS

On May 3, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting with stakeholders and the public to discuss Frequently Asked Questions (FAQs) at plants that are adopting National Fire Protection Association Standard 805 (NFPA 805). Licensees and the NRC staff discussed the list of currently open FAQs. The meeting announcement is in the NRC's ADAMS system as Accession No. ML16124A618. Action items are included below in **bold** type. A list of attendees is included in the enclosure to this memorandum.

The NRC staff presented comments including additions to FAQ 16-0076, "NFPA 805 Fire [Probabilistic Risk Assessment] PRA Update Process," see ML16111B143. The NRC staff and industry stakeholders discussed the NRC comments. Industry stakeholders questioned the need for additions to FAQ 16-0076, and indicated that the proposed additional information was either unnecessary or located elsewhere in the FAQ. The NRC staff responded that the additional information adds clarity moving forward and provides focus on the PRA update process timeline that may not be fully explained in the FAQ. Other editorial comments were also discussed, including aligning FAQ language to the language in the PRA standard. At the meeting it was agreed that the NRC staff would consider industry stakeholder comments made during the meeting. **The NRC staff will share their conclusions with respect to industry comments at the next FAQ meeting.**

NRC staff informed industry stakeholders that technical agreement had been reached on FAQ 14-0071, "Acceptable Uses for Non IEEE 383 Cables," see ML16118A085. **The NRC staff has the action to pursue closing out this FAQ.**

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NRC staff and industry stakeholder discussed a revision to FAQ 10-0059, “NFPA 805 Monitoring,” see ML16118A086. The FAQ proposed that application of the NRC’s maintenance rule (10 CFR 50.65) would in all cases be sufficient to meet the intent of NFPA 805 Section 2.6, which requires monitoring of fire protection systems and features to support the nuclear safety performance criteria. NRC staff raised concerns with the FAQ that there may be differences between the action levels (or “trigger points” or “thresholds”) in the fire protection program and the maintenance rule program, which could cause the programs to appear to be inconsistent. The NRC staff pointed out that there were ways to reconcile the programs, but was concerned that such information was not included in the FAQ. **At the meeting it was agreed that industry stakeholders would revise the FAQ to include NRC staff concerns provided during the meeting.**

At the meeting the NRC introduced discussion about recommended improvement (see ML16091A152) to closed FAQ 07-0040, “Non-Power Operations Clarifications.” FAQ 07-0040 is in ADAMS as Accession No. ML082200528. The recommended improvement to the FAQ involved additional guidance for screening key safety functions and higher risk evolutions related to fuel in the spent fuel pool during refueling. **At the meeting it was agreed that the industry stakeholders would propose a revision to the FAQ to be presented at the next FAQ meeting.**

Industry stakeholders asked about NRC staff review of FAQ 14-0073 “Acceptable Uses of Fuel Fired Equipment” Revision 2. The NRC staff had not reviewed the latest version dated March 13, 2016, see ML16125A501. **The NRC staff will be prepared to comment on this version at the next FAQ meeting.**

The NRC staff is preparing to update Regulatory Guide 1.205, “Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants,” Revision 1, see ML092730314. Regulatory Guide 1.205 endorses portions of Revision 2 of NEI 04-02, “Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c),” see ML081130188. The NRC staff asked industry stakeholders about their proposed schedule to prepare the next revision of NEI 04-02. **Industry stakeholders did not have the information available, but agreed to discuss the schedule for updating NEI 04-02 for the next FAQ meeting.**

The NRC staff and industry stakeholders agreed to hold the next FAQ meeting in approximately two months.

No public comments were provided during the public comment period.

Enclosure:
As stated

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Enclosure:
As stated

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ADAMS Accession No.: ML16133A410

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Date	05 / 16 / 16	05 / 16 / 16

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NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
FREQUENTLY ASKED QUESTIONS MEETING
LIST OF ATTENDEES

May 3, 2016

U. S. Nuclear Regulatory Commission Staff

G. Casto
S. Rosenberg
D. Frumkin
C. Moulton
H. Barrett
B. Metzger
J.S. Hyslop
S. Dinsmore

Stakeholders

V. Anderson – NEI*
J. Stone – Exelon
A. Ratchford – Jensen Hughes*
E. Kleinsorg – Jensen Hughes*
J. Ertman – Duke*
M. Murtha – FENOC*
T. Swiecicki – Entergy*
P. Bemis – PGE
K. Zee – Jensen Hughes*
A. Holder – Duke*
J. Walker – Jensen Hughes*
A. Jelalian – EPM*
B. Simril – TVA*
R. Harris – Enercon*

* participated via phone

ENCLOSURE