

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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805 TF FPWG RATF RIRWG BWROG PWROG

Purpose of FAQ:

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

Is this Interpretation of guidance? Yes / No

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

Commented [HJ1]: Note that industry's recommendation is for language to RG 1.205. Is this answer consistent with that?

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

Response Section:

the NFPA 805 transition change-in-risk. The change in risk requantification is as required by the Transition License Condition and associated Implementation Items.

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- The second is the licensee's PRA maintenance and update process, as discussed above. Maintenance and update procedures use criteria of a greater than 10% change in the CDF or greater than anywhere from a 1% to 20% change in the LERF to identify significant changes. Should the criteria be met, the PRA will be updated with the new information. Should the criteria not be met, then the PRA will not be updated, and the new information will be set aside until the next periodic/interim update or application of the PRA, at which point it will be considered.
- The third is a post transition fire risk evaluation of proposed plant modifications as part of the self-approval process or in support of a post transition risk informed LAR (i.e. self-approval risk acceptance guidelines are exceeded). The licensee will implement their PRA maintenance and update process to evaluate new information for the change analysis.

~~Licensees who have not yet completed the steps necessary for self-approval should evaluate new methods or data as part of the update process called for in the license condition. Licensees who have already fully transitioned to NFPA 805 can conduct this evaluation as part of their next periodic update. Should self-approval be applied, the licensee will implement their PRA configuration control process according to RG 1.200 and Section 1-5 of the ASME/ANS PRA Standard.~~ In the interim, a licensee's use of data and methods previously used to support NRC acceptance of the NFPA 805 LAR for review remains acceptable, and new information should be considered at the appropriate time as described above.

Given the above, licensees transitioning to NFPA 805 should address new information consistent with Section 1-5 of the ASME/ANS PRA Standard RA-Sa-2009 and RG 1.200 Rev. 2 as follows:

- Prior to the submittal of the NFPA 805 LAR, the PRA Configuration Control program applies. The cumulative impact of new information which arises before the submittal will be evaluated by the licensee prior to submittal of the LAR, even if the timeliness of this new information requires that the assessment must be performed in less time than discussed at the beginning of this FAQ solution under "Proposed resolution of FAQ and the basis for the proposal" section. Licensees will indicate in the LAR whether new methods or data are used in order to facilitate NRC's review.
- During the NFPA 805 LAR review, the NRC staff may request that the licensee identify new information, and should a safety issue arise at any time prior to the issuance of the SE, the NRC will raise this issue and ask that its impact be evaluated on the PRA results and acceptance guidelines.
- After the SE is issued, but before completing full transition, the NFPA 805 license condition calls for a licensee, prior to transition to self-approval, to update their PRA model to reflect the as-built, as-operated plant following NFPA 805 modifications. Licensees should evaluate the impact of the new information, e.g. method and data updates, prior to completing the requantification of the NFPA 805 transition change-

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