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June 7, 2016

Mr. Richard Correia
Director
Division of Risk Assessment
Office of Nuclear Regulatory Research
Washington, DC 20555-0001

Subject: Industry Comments on draft NUREG 2180, *Determining the Effectiveness, Limitations, and Operator Response for Very Early Warning Fire Detection Systems in Nuclear Facilities*

Project Number: 689

Dear Mr. Correia:

The Nuclear Energy Institute (NEI)¹ is pleased to submit the attached comments on NRC's draft NUREG 2180, *Determining the Effectiveness, Limitations, and Operator Response for Very Early Warning Fire Detection Systems in Nuclear Facilities*. The industry recognizes the important role of this document in further refining modeling of Very Early Warning Fire Detection Systems (VEWFDS) to support various regulatory applications, and appreciates the public workshop that the NRC conducted on April 26, 2016 to improve stakeholder understanding of the findings presented in the document.

The industry has reviewed the new spreadsheet tool presented at the workshop, and believes that the document and associated tool could benefit from a tabletop pilot exercise to ensure that the conclusions reached when applying the methodology support continued improvement to fire safety in the nuclear industry. This tabletop pilot will involve use of information from two plants to evaluate the process described in Section 12 of Part 2 of draft NUREG 2180, and will closely evaluate Sections 7 (fraction of fires with detectable incipient phase) and 11 (time to damage). The evaluation will involve both in-panel and area-wide applications to maximize the value of the tabletop pilot.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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It is our intention that this tabletop pilot will assist in identifying any potential changes necessary to NUREG 2180 to ensure proper application of the results, and ultimately, maximize the potential to encourage licenses to use VEFWDS to enhance safety, where possible and practical. To proceed with the pilot in an efficient manner, the industry will conduct the pilot using representative plant configurations. To share the results and any follow up discussion in a timely manner, the industry proposes to share the outcomes under the EPRI/NRC MOU.

We look forward to working with the NRC on the proposed pilot effort. If you have any questions concerning this proposed pilot effort or the detailed industry comments in the attachment to this letter, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Victoria K. Anderson".

Victoria K. Anderson

Attachment

c: Mr. Mark Henry Salley, RES/DRA/FXHAB, NRC
Mr. Gabriel Taylor, RES/DRA/FXHAB, NRC
NRC Document Control Desk