

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 22, 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 AUGUST 9, 2016, CATEGORY 2 MEETING

REGARDING TOPICS RELATED TO NUCLEAR POWER PLANT FIRE

PROTECTION

On August 9, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with stakeholders to discuss topics related to nuclear power plant fire protection. This meeting focused on Frequently Asked Questions (FAQs) at plants that are adopting National Fire Protection Association Standard 805 (NFPA 805) and other fire protection topics. The meeting announcement is in the NRC's ADAMS system as Accession No. ML16209A105. This was the first joint meeting of the NFPA 805 FAQ and general fire protection topics. Action items are included below in **bold** type. A list of attendees is included in the enclosure to this memorandum.

The NRC staff discussed their comments on FAQ 16-0076, "NFPA 805 Fire PRA [Probabilistic Risk Assessment] Update Process," see ML16208A081. Although there appeared to be general agreement of the concepts between NRC staff and industry stakeholders, the attendees could not easily agree on the best language to convey those concepts. For example, the NRC staff agreed that a fire PRA model need not be re-evaluated using new information for every plant modification, but the FAQ could have better explained when a PRA does need re-evaluation. There was also considerable discussion of what constituted an "application." Industry stakeholders will submit a new version of the FAQ in two to three weeks to the NRC. Dependent on the version language, the NRC staff will schedule a public teleconference, to achieve alignment regarding the FAQ wording.

NRC staff informed industry stakeholders that FAQ 14-0071, "Acceptable Uses for Non IEEE 383 Cables," has been closed. See closure memorandum ML16126A543. Note the accession number in the meeting announcement was incorrect.

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NRC staff and industry stakeholder discussed a revision to FAQ 10-0059, "NFPA 805 Monitoring," see ML16217A177. The NRC staff expressed concern with the FAQ's removal of language that describes that the maintenance rule threshold values must bound the values in the fire PRA. Industry stakeholder said that the maintenance rule values would be overly conservative if used in the fire PRA. The attendees agreed that there is a potential path to technical agreement. The path involves having the FAQ describe how maintenance rule distributions – and mean values – will ensure that assumptions in the fire PRA remain valid. Industry stakeholders agreed to develop language and submit it to the NRC.

Industry stakeholders had provided a proposed Revision 5 to FAQ 07-0040, "Non-Power Operations Clarifications," see Accession No. ML16193A464. The NRC staff provided written comments to NEI on August 3, 2016, see ML16216A451. After some discussion, industry stakeholders said they understood the NRC comments. **Industry stakeholders agreed to revise the FAQ and submit it to the NRC.**

NRC staff stated that they had reviewed the March 13, 2016, version FAQ 14-0073 "Acceptable Uses of Fuel Fired Equipment" Revision 2, see ML16125A501. The NRC staff indicated that they did not see a path forward for the FAQ. Industry stakeholders asked that the NRC staff provide a description of the NRC staff's justification in writing. The NRC staff agreed to provide information to industry stakeholders regarding concerns with the FAQ.

The NRC staff asked about the industry's intention to submit a revision to NEI 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c)," see ML081130188, to support a future revision of Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," Revision 1, see ML092730314. Industry stakeholders stated that a version of NEI 04-02 should be available for NRC staff review by the middle of October 2016.

The NRC staff asked about the industry's intention to submit a revision to NEI 00-01, "Guidance for Post-Fire Safe Shutdown Circuit Analysis," see ML091770265, to support a future revision of Regulatory Guide 1.189, "Fire Protection for Nuclear Power Plants," See ML092580550. Industry stakeholders stated that a draft of NEI 00-01, should be submitted for NRC review by the middle of September 2016.

Industry stakeholders stated that a white paper on the resource implication of fire protection inspections is expected to be submitted to the NRC by the end of August 2016.

No public comments were provided during the public comment period	Ν	0	public	commen	ts were	provided	during	the	public	comment	perio
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Enclosure: As stated

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Enclosure:

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ADAMS Accession No.: ML16229A236

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Date	08 / 11 / 16	08/ 19 /16	08 / 22 / 16

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

August 9, 2016

U. S. Nuclear Regulatory Commission Staff

- G. Casto
- S. Rosenberg
- D. Frumkin
- A. Patel
- C. Moulton
- B. Metzger
- J.S. Hyslop
- S. Dinsmore
- C. Moulton
- S. Alferink*

Stakeholders

- V. Anderson NEI
- S. Hutchins NEI
- J. Reed NEI
- A. Ratchford Jensen Hughes
- E. Kleinsorg Jensen Hughes
- R. White Jensen Hughes
- T. Gorman Jensen Hughes
- A. Lindeman EPRI
- M. Schairer EPM
- A. Jelalian EPM
- R. Dukes Enercon
- J. Stone Exelon*
- M. Fletcher Ameren*
- J. Lechner Jensen Hughes*
- J. Walker Jensen Hughes*
- J. McQuighan Exelon*
- L. Casella Southern Nuclear*
- D. Davidson Southern Nuclear*
- J. Vo Southern Nuclear*
- T. Swiecicki Entergy*
- R. Kalantari EPM*
- J. LeMaire EPM*
- J. Quinn EPM*
- M. Murtha First Energy*
- J. Ross First Energy*
- R. Regan FP&L*
- S. Dolley Platts*

^{*} participated via phone