

From: Frumkin, Daniel
Sent: Thursday, August 18, 2016 4:20 PM
To: ANDERSON, Victoria (vka@nei.org)
Cc: Casto, Greg; Moulton, Charles; Barrett, Harold
Subject: Comments to NEI on FAQ 14-0073 - Fuel Fired Equipment

Victoria,

Below are comments on NFPA 805 Frequently Asked Question (FAQ) 14-0073, Acceptable Uses of Fuel Fired Equipment - ML16125A501, which provide basis for our non-acceptance of the FAQ. Industry stakeholders requested written comments during the August 9, 2016 public FAQ meeting.

- 1) The NRC staff does not agree with the concept that a fire caused by fuel fired emergency equipment used to respond to an initial fire is considered "independent." If a piece of emergency equipment were to catch fire when called upon, this would not be considered independent.
- 2) The NRC staff does not agree that the hazards of this equipment do not need to be addressed in the analyses. This lack of consideration is a significant issue that has prevented the NRC staff from accepting the use of this equipment.
- 3) The NRC staff does not agree that the use on fuel fired equipment was justified by the FAQ author. The FAQ fails to explain acceptable uses for fuel fired equipment (not heaters) and why those uses are consistent with the regulatory framework. The FAQ includes extensive discussion of RAIs, GDC 3, regulations and NFPA 805 standard language. This discussion is not consistent with the title of the FAQ, "Acceptable Uses of Fuel Fire Equipment." Additionally, the FAQ mentions review issues that have been settled, so ~~this~~ the information provided adds little value.
- 4) The FAQ's conclusion "K.X" adds little value to the regulatory process. First it restates the NFPA 805 standard language about the prohibition of fuel fired heaters, then it says that licensees should follow their combustible control program regarding other fuel fired equipment. Restating the standard has no value. Additionally, in the five pages of the FAQ there is very little to explain the correct use of other types of fuel fired equipment. Please note in NRC comments on the FAQ ML14336A078 – the NRC specifically asked about specific applications of fuel fired equipment (not heaters), and the revised FAQ did not satisfactorily address those comments.

Based on these reasons, the NRC staff does not see a path to closure for this FAQ. This email will be put into ADAMS.

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