

Responses to NRC Comments on FAQ 17-0012

Objective: Incorporate into the event trees of NUREG-2180 both a no-fire end state (prevention strategy) and a no-fire-damage-beyond initiating-component end state (enhanced/targeted suppression).

	NRC Comment	Response
Missing justification and basis for a number of assumptions	Basis for changing 30 minute threshold	Expanded the basis for selecting a 1 hour threshold
	Justification for combining scenarios specific HEPs	<i>Need to improve understanding of this comment</i>
	Explanation of data pool relevance to estimate the new term δ_1	Expanded the discussion of OE used to estimate probability
	Basis for the use of a weighting factor to be applied to the data set for δ_1 in area wide use	Strengthen justification for using a weighting factor for area-wide probability
	Misrepresenting operating experience related to sensitivity of cloud chamber and applying it to other technologies	<i>Need to improve understanding of this comment</i>
	Justification for use MCR in area-wide applications	Strengthen justification for using MCR curve for FB
HRA is inconsistent with the PRA standard and "real world operations"	Crediting operator actions that are not proceduralized	Clarified context for success with simpler procedures performed by trained and experienced personnel
	Crediting field operators de-energizing equipment without control room direction	Inconceivable.
	Crediting field operator actions that require electrical cabinet doors to be open	That is the real world intent.
Some confusion with document	Organization of this document makes it difficult to follow and understand	Simplified and clarified
	In the "Purpose of FAQ" section it states that "an incipient review of the FEDB is enclosed." The enclosure provides information that is not related to the incipient stage, but rather the fire duration and single component damage.	Deleted enclosure and removed statement
	Presents information that is not relevant to the FAQ purpose, not used within the FAQ, and has already been responded to by the NRC (ML16271A159)	<i>Need to improve understanding of this comment, if not addressed by the simplification and deletion of the enclosure</i>