

## Historical References

### GAO 08-747 Recommendation 2:

“Address safety concerns related to extended use of interim compensatory measures by:

- Defining how long an interim compensatory measure can be used and identifying the interim compensatory measures in place at nuclear units that exceed that threshold;
- Assessing the safety significance of such extended compensatory measures and defining how long a safety significant interim compensatory measure can be used before NRC requires the unit operator to make the necessary repairs or replacements or request an exemption or deviation from its fire safety requirements; and
- Developing a plan and deadlines for units to resolve those compensatory measures.”

### The Commission in July 29, 2008, SRM M080717 Directed the Staff to:

“The staff should also provide to the Commission a plan to assess the effectiveness of the ongoing improvements to the fire protection regulatory framework, using recent plant data to establish a baseline. Such a baseline could be, for example, the number and general type of all open fire protection deficiencies that were compensated and the manner of compensation used in CY2007.”

### The Commission Responded to Congress on September 11, 2008, regarding Metrics:

"The Commission has directed the staff to include meaningful metrics to gauge progress in implementation of the Closure Plan."

### The NRC response to this action was included in letter to Carper dated April 16, 2009:

“The NRC has concluded that adequate compensatory measures provide comparable protection to ensure the health and safety of the public, regardless of how long those compensatory measures are employed. The fire protection programs at nuclear power plants are built upon the concept of defense-in-depth with layers of protective features. The technical deficiencies being compensated do not invalidate the defense-in-depth approach. As discussed in the response to Recommendation 1, NRC inspectors periodically inspect a sample of each plant’s fire protection compensatory measures for adequacy. The Staff has developed a plan to address the issues contributing to the long-term use of compensatory measures in the Fire Protection Closure Plan (SECY-08-0171). The Commission has directed the staff to include milestones and deliverables, as well as meaningful metrics to gauge progress of its actions in the implementation of the Closure Plan. In addition, the staff plans to track the closure of long-term compensatory measures as part of Task # 5 of the Fire Protection Closure Plan, “Assess Regulatory Effectiveness.” In summary, the NRC has addressed Recommendation 2 in the Fire Protection Closure Plan (SECY-08-0171) as discussed above. The NRC considers this GAO recommendation to be closed.”

### In May 2011 SECY 2011-0063 the final Stabilization Plan SECY the NRC staff reported to the Commission:

“The NRC staff considers this [metrics] an ongoing activity and will continue to assess the effectiveness of the fire protection framework through monitoring until such time as the staff has determined that additional monitoring is no longer warranted. Currently, the monitoring is documented in a publicly available memorandum from the NRC Office of Nuclear Regulatory Research. The most recent memorandum was dated April 5, 2011.”