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Methodology for Modeling Transient Fires in Nuclear Power Plant Fire Probabilistic Risk Assessments

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## Submitter Information

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## General Comment

The National Fire Protection Association (NFPA) submits the attached comments.

## Attachments

NFPA Comments for NRC

**NATIONAL FIRE PROTECTION ASSOCIATION**
**The leading information and knowledge resource on fire, electrical and related hazards**
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February 14, 2020

Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**Reference: Docket ID NRC-2019-0229**
**Methodology for Modeling Transient Fires in Nuclear Power Plant Fire Probabilistic Risk Assessments**

The National Fire Protection Association (NFPA) thanks the Nuclear Regulatory Commission (NRC) for the opportunity to provide comments concerning the proposed revisions to the fuel cycle oversight program. We share your concern for transparency, predictability, objectivity and consistency, using risk-informed and performance-based tools.

NFPA, founded in 1896, is a self-funded not-for-profit organization dedicated to the elimination of death, injury, property and economic loss due to fire, electrical and related hazards. Each of our more than 300 codes and standards, including NFPA 70, *National Electric Code*, are updated every 3 to 5 years using an ANSI-approved consensus process.

NFPA believes that the goals and constituents of the NRC are best served when its regulations are tied as closely as possible to codes and standards developed in accordance with a full-consensus process, accredited by the American National Standards Institute. **NFPA 805, *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants*, describes the methodology for applying performance-based requirements, fundamental fire protection program design and elements, determination of fire protection systems and features, and fire protection during decommissioning and permanent shutdown.** This document was assembled through a consensus process with a wide range of technical experts from the nuclear field, which includes representation and active involvement from the NRC. All NFPA codes and standards meet this high standard of quality.

The 2001 edition of NFPA 805 has been adopted in part by the NRC as a voluntary option for complying with 10 CFR 50.48. Of the 106 nuclear facilities that are commercially operating in the US, at least 51 plants have opted to utilize the risk-informed approach set forth in NFPA 805.

For these reasons, the current NFPA 805 should be an integral component of the NRC's revised oversight process as set forth in NUREG-1649. Please note that the 2001 edition is considered to be outdated material and that a 2020 edition is now available. We strongly encourage the use of the most recent editions of all our consensus codes.

**Consideration should also be given for the inclusion of the NFPA risk-informed fire protection standard NFPA 806, *Performance-Based Standard for Fire Protection for Advanced Nuclear Reactor Electric Generating Plants Change Process*** that has undergone the same consensus-based review process as described above. NFPA 806 is a unique, stand-alone standard and the only document dealing with any change process for use during construction and all phases of plant operation including shutdown, degraded conditions, and decommissioning. NFPA 806 has become an important part of the regulatory oversight method that was developed upon request and with the involvement of the NRC.

**It is also important that NFPA 804, *Standard for Fire Protection for Advanced Light Water Reactor Electric Generating Plants*, be a part of NRC's oversight process.** This document is a prescriptive one; however, NFPA 804 ensures that proper fire protection measures are implemented from the early development stages of new fuel cycle facilities. As a part of the NRC oversight procedure, the proper implementation of NFPA 804 ensures that fire protection is fully integrated into the original plant construction and not as an exhaustive and expensive afterthought.

NFPA also recommends that the **NRC consider adding the NFPA 1600, *Standard on Disaster/Emergency Management and Business Continuity Programs***, as a resource. This document, adopted by the Department of Homeland Security, would provide a framework for the NRC's fuel cycle facility oversight program inspections. NFPA 1600 provides a common set of criteria that would also allow the NRC to assess these facilities' emergency preparedness programs, or assist them to develop, implement, and maintain these programs. Program elements as outlined in NFPA 1600 include prevention, mitigation, preparation, response and recovery from emergencies.

We would welcome the opportunity to provide any additional information that would be helpful as NRC seeks to ensure the safety of nuclear power plants.

Sincerely,

Seth Statler

L. Seth Statler
Director of Government Affairs
National Fire Protection Association