

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

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November 14, 1990

Mr. Warren Minners, Director
Division of Safety Issue Resolution
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Mail Stop NLS007
Washington, DC 20555

Dear Mr. Minners:

Your letter of September 20, 1990, forwarded NRC Staff comments on the draft Fire Vulnerability Evaluation (FIVE) methodology developed by EPRI in support of NUMARC. It also identified three tasks requiring completion in a timely manner in order to support Staff's ability to complete review of FIVE as an accept examination method for identifying severe accident vulnerabilities due to internal fire. Those tasks are: (1) submittal of a revised FIVE report reflecting NRC comments provided by your letter noted above; (2) submittal of an updated fire events database being prepared by EPRI; and (3) submittal of an assessment of the validity of the fire modeling techniques employed in the FIVE methodology.

As discussed between Mr. David Modeen of NUMARC and Messrs. Conrad McCracken and John Chen of the Staff, we are forwarding, in fulfillment of the first task, a revised FIVE report (Enclosure 1), an item-by-item response to the Staff comments forwarded by your letter noted above (Enclosure 2), and a copy of EPRI Report NP-6989, "Survey of Earthquake-Induced Fires in Electric Power and Industrial Facilities" (Enclosure 3), in order to have the FIVE identified as an acceptable examination method in the final Generic Letter 88-20, Supplement 4. The revised FIVE report reflects our responses provided in Enclosure 2. Inasmuch as Attachments 10.4 and 10.7 describing the derivation and use of the quantitative fire hazard analysis employed in the FIVE methodology are unchanged from the previous version and quite lengthy, we have not enclosed them in this distribution.

Regarding the second task, EPRI will be forwarding by separate letter an updated fire events database to NRC Staff, under proprietary cover, on or about November 26, 1990. Though Reference Table 1.2 in the FIVE report contains values for fire initiators based on this database, application of those values in the FIVE methodology is independent of the values themselves. Therefore, we believe evaluation of the FIVE methodology can proceed independent of the database review.

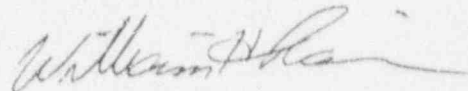
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Regarding the third task, EPRI has conducted several assessments to confirm the validity of the fire modeling techniques utilized in the FIVE methodology. Additional confirmatory work is still in progress. We anticipate that information will be provided directly by EPRI to Staff on or about November 20, 1990.

We appreciate Staff's cooperative efforts in development of this alternative methodology and its timely review in order that it may be referenced in the upcoming generic letter supplement. As expressed by several utility representatives at the NRC public workshop on the Individual Plant Examination of External Events (IPEEE), it is important to licensee planning of IPEEE programs that the final generic letter supplement identify the FIVE methodology as an acceptable alternative to a fire PRA.

Sincerely,



William H. Rasin
Director, Technical Division

DJM/kls
Enclosures

cc: C. McCracken, NRC
C. Reed, CECO (without enclosures)
J. Sursock, EPRI (without enclosures)