

**VICTORIA K. ANDERSON**  
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December 18, 2020

Jennifer Borges  
Office of Administration  
Mail Stop: TWFN-7-A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments on Draft Regulatory Guide (DG) 1360, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," 85 FRN 73088-73089; Docket ID NRC-2020-0231

*Submitted via regulations.gov*

**Project Number: 689**

Dear Ms. Jennifer Borges:

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of its members, submits the following comments on DG-1360, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." We are supportive of the effort to revise this regulatory guide to endorse the latest revision of NEI 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)," and appreciate the opportunity to comment on the draft revision. In our review, we noted that the draft revision generally offers improvements in clarity and consistency. We have included detailed comments in an attachment for your use in finalizing this regulatory guide.

We encourage NRC to consider all stakeholder comments prior to finalizing the revision to this regulatory guide. Please contact me at [vka@nei.org](mailto:vka@nei.org) or (202) 739-8101 with any questions regarding our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Victoria K. Anderson", written in a cursive style.

Victoria K. Anderson

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<sup>1</sup> The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Ms. Jennifer Borges

July 29, 2020

Page 2

Attachment

c:      Mr. Michael Franovich, NRR  
         Mr. Greg Bowman, NRR  
         Mr. Joshua Borromeo, NRR  
         Mr. Shivani Mehta, NRR  
         Mr. Charles Moulton, NRR  
         Mr. Michael Eudy, RES

**Attachment: NEI Detailed Comments on DG-1360, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants"**

Section	Comment	Proposed Resolution
Section 3, Pages 22-24	Section 3.3 – Fire PRAs utilize processes in NUREG/CR-7150, Volume 2 on hot short-induced spurious operation probability and duration.	In order to acknowledge this and provide clarification in the event of any conflicts with Section 3.3, the following statement is recommended in Section 3.3 (following the paragraph in page 4 on shorting switches): "Guidance for circuit failure mode likelihood and hot short duration for use in Fire PRAs is included in NUREG/CR-7150, Volume 2."
Section 3.1, Page 19	The following statement that is included in most, if not all, license conditions, is not included in Section 3.1. "This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805."	Recommend including that statement at the end of "(1) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program."

SUNI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03

ADD: Shivani Mehta,  
Charles Moulton,  
Michael Eudy, Mary  
Neely  
Comment (2)  
Publication Date:  
11/16/2020  
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# PUBLIC SUBMISSION

**Docket:** NRC-2020-0231

Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants

**Comment On:** NRC-2020-0231-0001

Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants

**Document:** NRC-2020-0231-DRAFT-0004

Comment on FR Doc # 2020-25173

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## Submitter Information

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**Email:** vka@nei.org

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## General Comment

CORRECTION for previously submitted Comment:

12-18-20\_NEI Comments on Draft Regulatory Guide (DG) 1360, 85 FRN 73088-73089; Docket ID NRC-2020-0231

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## Attachments

12-18-20\_NEI Comments on Draft Regulatory Guide (DG) 1360, 85 FRN 73088-73089; Docket ID NRC-2020-0231