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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-0005

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## General Comment

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

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## Attachments

NFPA Comments on NRC-Docket-ID-NRC-2020-0231



**NATIONAL FIRE PROTECTION ASSOCIATION**

The leading information and knowledge resource on fire, electrical and related hazards

December 23, 2020

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

**Reference: Docket ID NRC-2020-0231**  
**Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants**

The National Fire Protection Association (NFPA) thanks the Nuclear Regulatory Commission (NRC) for the opportunity to provide comments concerning the draft regulation guide DG-1360, **Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants**. 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 are updated every 3 to 5 years using an ANSI (American National Standards Institute)-approved consensus process and all NFPA standards, including those referenced in these comments, are available to be viewed online, free of charge, at [www.nfpa.org/standards](http://www.nfpa.org/standards).

As outlined in the proposed regulatory guidance, the 2001 edition of NFPA 805, **Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants**, has been adopted in part by the NRC as a voluntary option for complying with 10 CFR 50.48. Since the development of the standard, NFPA 805 has maintained a 5-year revision cycle through a consensus process consisting of 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.

DG-1360, section 2.2.3 proposes guidance on how licensees may request and receive approval for the use of alternative risk-informed or performance-based methods to deterministic compliance with 10 CFR 50.48(c) (i.e., methods that differ from those prescribed by NFPA 805). As described in NFPA 805, section 1.7 nothing in the standard is intended to prevent the use of systems, methods, or devices of equivalent or superior

quality, strength, fire resistance, effectiveness, durability, and safety over those prescribed within the standard. With the submission of technical documentation to the authority having jurisdiction (i.e., the NRC), approval of an equivalent system, method, or device can be granted. NFPA 805 further defines “approved” as acceptable to the authority having jurisdiction. As written, it can be inferred by the licensee that the language of 10 CFR 50.48(c)(4) and the proposed language of DG-1360, 2.2.3 is what grants the user the ability to submit alternative methods for approval by the NRC. Since the NRC has already incorporated NFPA 805 into 10 CFR 50.48, this permission is already provided and much of the language within 10 CFR 50.48(c)(4) is to a degree redundant with NFPA. The value found in the proposed DG-1360, 2.2.3 language is its identification of what the NRC requires a licensee to include as technical documentation for alternate method approval, per 10 CFR 50.48(c)(4). However, the submittal of the technical documentation itself to the NRC is already required per NFPA 805, 1.7.

NFPA supports the NRC in providing guidance to licensee’s efforts in gaining approval for alternative methods prescribed by NFPA 805 but recommends that the NRC revise the language of DG-1360, 2.2.3 to include reference to NFPA 805, 1.7. This will not only clarify the alignment between DG-1360 with NFPA 805 but also reinforce the incorporation of NFPA 805 into 10 CFR 50.48. Additionally, NFPA recommends that the NRC consider making future revisions to 10 CFR 50.48(c)(4) to reduce the redundant language with NFPA 805.

We recommend that efforts should focus on more closely aligning 10 CFR 50.48(c)(4) with NFPA 805 and more on what licensees must include in the technical documentation already required by NFPA 805, 1.7 versus providing Special Exemptions under 10 CFR 50.12.

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 ANSI. For these reasons, the current edition of NFPA 805 should be an integral component of the NRC. Please note that the 2001 edition of NFPA 805 is considered to be outdated material and that a 2020 edition is now available.

**In the time since NFPA 805 was originally issued and adopted in part by the NRC, substantial changes have been incorporated into the standard.** The current 2020 edition of NFPA 805 coordinates with NFPA 806, *Performance-Based Standard for Fire Protection for Advanced Nuclear Reactor Electric Generating Plants Change Process* and NFPA 101®, *Life Safety Code*®, no longer includes personnel considerations in the methodology for defining fire scenarios, and has undergone substantial reformatting to comply with the current *Manual of Style for NFPA Technical Committee Documents*. **The 2020 edition of NFPA 805 is the most advanced performance-based standard for fire protection within the industry and we strongly encourage its adoption into 10 CFR 50.48.**

On behalf of NFPA, thank you for the opportunity to offer these comments.

Sincerely,

A handwritten signature in blue ink that reads "Seth Statler". The signature is written in a cursive style with a large initial "S".

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