

RIC 2004

Fire Protection, Session T14

Fire Protection Issue Management

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Triennial Fire Inspections

87 Inspections completed since 1999

12 Sites (14%) with No Issues to Date

186 Issues Written – Very Few are Significant

White	3	2%
Green	96	51%
No Color	13	7%
URI or Color TBD	74	40%



Challenges - Licensing Bases and NRC Approvals

**Variability in Licensing Basis Language
Explicit vs. Implicit SER Language**

Normally, NRC Approvals Fall In 3 Categories

- 1. Conformance to an Applicable Standard**
- 2. Plant Specific Review of a Deviation to an Applicable Standard**
- 3. Plant Specific Review Where There Is No Standard
None Exist – or – Pre-dates Standard**

Gray Areas Abound

Past Inspections Aren't Approvals



Issue Management Success

Plants with clearly understood and stable set of regulatory and licensee expectations

Issues should follow predictable life-cycle from identification to resolution

Process transparency, status, progress

Clear entry-point to process

Inspection moratorium for unresolved issues

Clear closure – Closed w/o action or Closed w/ action

Action for plant(s) is clearly communicated, including criteria. Issued via appropriate process.

Not just a change in the Inspection Procedure



Cooperation to Resolve Issues

Issue Management Process

NEI 02-03 – FP Change Process

FP SDP Revision

NFPA 805

BWROG & NEI Deterministic Criteria

CO₂ and Life Safety



Cooperation to Resolve Issues

Circuit Failures Testing Results

- Multiple Spurious Actuations
- Inspections to Resume
- FAQ Process Needed

Manual Actions

Self Assessment Guidance

NEI 03-00, NEI 04-06



Summary

Complex Regulatory Issues

Gray Areas

Identify and Manage the Issues