

Plans for Inspection of Risk-Informed Fire Protection

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NFPA 805 Inspection Guidance

- How will the NRC Inspect during Transition to NFPA 805?
- How will the NRC develop Inspection Guidance for Plants which have adopted NFPA 805?
- How will the NRC Inspect after Transition to NFPA 805?

NFPA 805 Inspection Guidance Inspections During Transition Period

- Starts with Submission of Transition Letter of Intent, including Proposed Schedule.
- Plant remains committed to Current License Basis During Transition until NRC Approval of Amendment Request.
- Regions will continue Triennial Inspections on established schedule, “limited scope inspection” of the existing fire protection program.

NFPA 805 Inspection Guidance Inspections During Transition Period

- Enforcement Discretion Applies (two year period)
 - Noncompliances identified during the transition
 - Existing noncompliances
 - Discretion does not apply to violations categorized at Severity Level I or to Red findings.
- NRC Headquarters and Regional Staff will conduct observation visits at the pilot plants (will not overlap schedule with the triennial inspection).

NFPA 805 Inspection Guidance Development of Inspection Guidance

- Establish a working group
- Obtain Stakeholder input
- Incorporate lessons learned from Observation visits into inspection guidance
- Conduct training for Regional Staff

NFPA 805 Inspection Guidance Inspections After Transition Period

- After NRC Approval of Amendment Request
- Regional Triennial Inspection to NFPA 805 Criteria at same level of effort as before
- Inspections will focus on same safety aspects as before for fire protection program and safe shutdown requirements

NFPA 805 Inspection Guidance Inspections After Transition Period

- Application of Acceptable Fire Hazards Models
- Application of Approved NEI 04-02 Risk Informed Change Control Process Guidance and RG 1.174
- Application of Risk Assessment Tools