

RIC 2006

Session T1D

Fire Protection: Risk-Informed and Performance-Based

NRC Activities in Support of NFPA 805 Implementation

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Outline

1. Regulatory Strategy

2. Current Status & Next Steps

3. NFPA 805 Plants

- (a) Current Status
- (b) Planned Actions

4. NRC Activities

- (a) Develop/Endorse Acceptable Methods and Standards
- (b) Develop Inspection Guidance and Modify Procedures
- (c) Develop Regulatory Guide and SRP
- (d) Modify Enforcement Discretion Policy
- (e) Information Sharing with Pilots and Non-Pilots
- (f) Resource/Staffing/Skills Development

5. Conclusions



Regulatory Strategy

- Clarify regulatory requirements (Generic Letters, Regulatory Issue Summaries), and inspect & enforce current rule (non-NFPA 805 plants) as a part of the current ROP
- Provide a risk-informed, performance-based alternative rule (NFPA 805)



Current Status

- Generic Communications necessary to clarify regulatory expectations issued in final or draft form
- Reg Guide 1.189 and SRP 9.5.1 updates are planned and budgeted
- NFPA 805 Reg Guide, Inspection Procedures, and SRP are planned and budgeted



Next Steps

- There are two types of challenges:
 - NFPA 805 Plants - Program Implementation
 - Appendix R & SRP Plants (not adopting NFPA 805)
 - Generic Communications and implementation of the inspection, assessment, and enforcement programs in accordance with the ROP



NFPA 805 Plants

- Status
 - Published Rule in June, 2004
 - Pilot Plant Kick-Off meeting was in August, 2005
 - Letters of Intent for 37 Plants



NFPA 805 Plants

- Planned Actions
 - Support Pilots
 - Develop/refine regulatory infrastructure - support inspections of transitioning and transitioned plants
 - Support Non-Pilots
 - Receive/review/approve NFPA 805 license amendment requests



Develop/Endorse Acceptable Methods and Standards

- NRR issued NUREG-1805 on Fire Modeling
- RES issued NUREG/CR-6850 on Fire PRAs
- RES issued NUREG-1824 on Fire Modeling Verification & Validation (Draft for Comment)
- NEI developing Fire PRA Peer Review Guide
- ANS developing Fire PSA Standard
- NRC developing RG 1.200 on PRA Quality



Develop Inspection Guidance and Modify Procedures

- Inspection Guidance: During Transition
- Inspection Guidance: Post Transition
- Modify applicable ROP procedures



Develop Regulatory Guide and Standard Review Plan

- Regulatory Guide
- NEI 04-02
- Standard Review Plan

Modify

Enforcement Discretion Policy

- Modified policy in June 2004 to accommodate NFPA 805 transition
- Revised policy in December 2004 to accommodate licensee's budgeting cycle
- The Staff to recommend to the Commission additional time for licensees to complete transition



Information Sharing with Pilots and Non-Pilots

- Pilot Observation Visits
- Lessons Learned Reports for Non-Pilots
- First Information Sharing Workshop
(March 3, 2006)
- Periodic Workshops for Non-Pilots
(August 2006)

Resource/Staffing/Skills Development



- Plan for peak workload in 2009/2010
- Continue to develop HQ Fire Protection Staff skill set
- Continue to develop Regional Staff skill set



Conclusion

- NRC is committed to work with stakeholders to address implementation challenges for plants transitioning into NFPA 805 compliance