



# **NRC Perspective on Fire Protection for Plants not Adopting NFPA 805**

Daniel Frumkin, Team Leader – Fire Protection Branch  
2010 NRC Regulatory Information Conference



# Topics

- History – How did we get here?
- Fire-Induced Circuit Failures
- Operator Manual Actions
- End Enforcement Discretion
- Path Forward



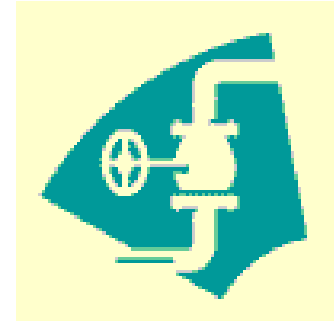
## History – How did we get here?

- Thermo-Lag resolution
- Question on credibility of multiple spurious actuations
- Enforcement Guidance Memorandum (EGM) 98-002
- Dependence between circuits and manual actions



# Fire-Induced Circuit Failures

- NUREG/CR-6931 and Nuclear Energy Institute (NEI) testing in 2001
- SECY-06-0196 – Generic Letter (GL) 2006-XX
- SECY-08-0093
- Regulatory Guide 1.189, Revision 2 and NEI 00-01, Revision 2



## Operator Manual Actions

- Rulemaking
  - SECY-03-0100 – Rulemaking Plan
  - SECY-04-0233 – Proposed Rulemaking
  - SECY-06-0010 – Withdraw Proposed Rulemaking
- RIS 2006-10, “Regulatory Expectations with Appendix R Paragraph III.G.2 Operator Manual Actions”
- NUREG-1852, “Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire”



# End of Enforcement Discretion for Plants Maintaining Their Approved Fire Protection Programs

- EGM 98-002, Superseded by EGM 07-004 and EGM 09-002
- EGM 07-004 ended March 6, 2009
- EGM 09-002 ends May 2, 2010, to identify multiple spurious circuit issues and November 2, 2012 to correct multiple spurious circuit issues



## Path Forward

- NRC will validate that there is sufficient guidance to licensees regarding achieving compliance with safe shutdown requirements
- NRC staff plans to validate licensee implementation of guidance beginning next triennial cycle, January 2011
- NRC will continue to inspect safe shutdown issues, including fire-induced circuit failure issues and operator manual actions