

**RIC March, 2010
Perspectives from a non-
NFPA 805 Plant on Fire
Protection Compliance**

**Thomas A. Gorman
PPL Susquehanna, LLC**

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Non-NFPA 805 Perspective

- Discussion Topics:
 - Nuclear Plant Safety
 - The Choice to be Made
 - Considerations in Choosing
 - Recent Industry Changes
 - Plant Specific Evaluation
 - Estimated Costs
 - Conclusions

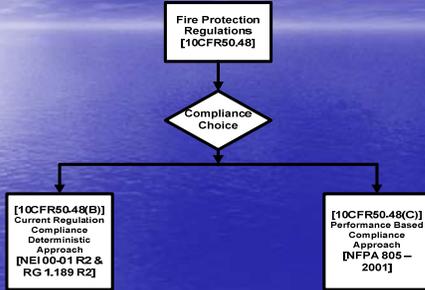
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Nuclear Plant Safety

- Regardless of the selected compliance strategy, Nuclear Plant Safety is paramount.
- Either of the available options provides for a safe plant design when properly engineered and implemented.
- The safe design of our facilities has been assessed on numerous occasions over long periods of time and has been proven to be good.

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The Choice to be Made



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Considerations in Choosing

- Plant's Position relative to the current compliance issues:
 - Electrical Raceway Fire Barriers
 - Post-Fire Safe Shutdown Circuit Analysis
 - Use of Operator Manual Actions
- Ability to better assess Fire Risk
- For Fleet Plants
 - Consistent approach across the Fleet

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Recent Industry Changes

- Issuance of NEI 00-01 R2 & RG 1.189 R2
 - Provides a bounded, but challenging approach for analyzing the effects of fire-induced circuit failures.
 - Provides a path for the use of Operator Manual Actions where appropriate.
 - Provides long term stability for deterministic compliance under 10CFR50.48(b) – Appendix R.
- Conservatism built into the Fire PRA when used for Design Basis masks a true Fire Risk Picture
 - Significant Additional Expenditures would be required to arrive at a true Fire Risk Picture.

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Plant Specific Evaluation

- Electrical Raceway Fire Barrier Issues addressed in 1990's
- Fire-induced circuit failure issues addressed in 1990's
 - Will require some additional work based on NEI 00-01 R2 and RG 1.189 R2
- Limited use of Operator Manual Actions
 - Uses are consistent with approved Emergency Operating Procedures (EOPs)

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Estimated Costs

- Between 1985 and 2000
 - Spent approximately \$60.0 to \$80.0 Million maintaining the Fire Protection Program for compliance with the evolving deterministic requirements.
- Modest Expenditures expected for meeting RG 1.189 R2 changes
- Cost to transition to NFPA-805 would significantly outweigh any benefit in terms of plant safety or risk reduction.

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Conclusions

- Plant specific issues have led licensee's to opt for a compliance approach under NFPA-805
- Recent Industry/NRC initiatives have established a measure of stability for non-NFPA Compliance Approaches relative to the issues.
- Depending on plant specific conditions, the cost for achieving compliance will drive the decision.
 - For us the decision is clear: Transitioning to NFPA-805 will cost significantly more than any benefit derived in the areas of plant safety or risk reduction.
 - We do not plan on transitioning to NFPA-805.

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