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**Perspectives from a non-
NFPA 805 Plant on Fire
Protection Compliance**

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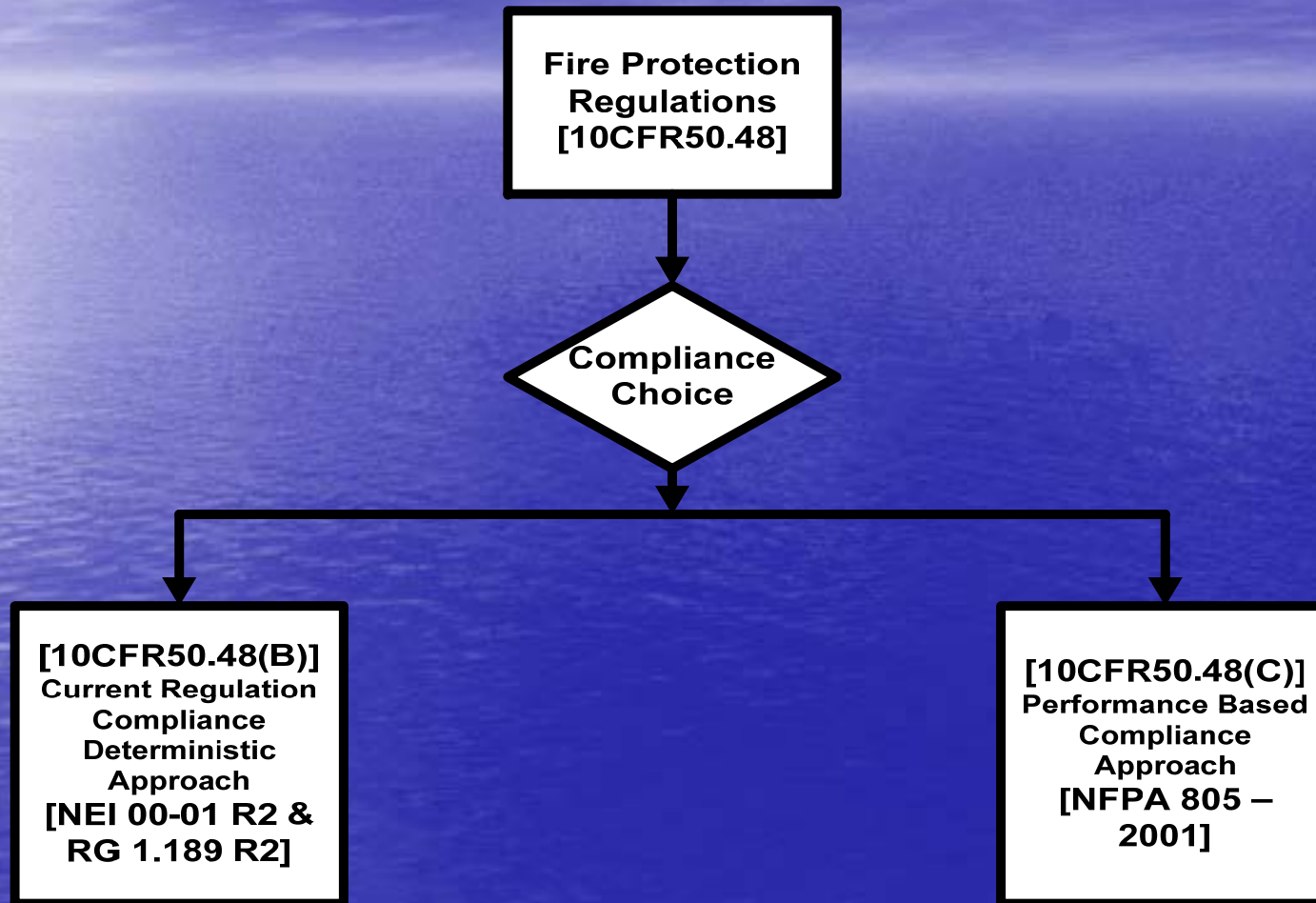
Non-NFPA 805 Perspective

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

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.

The Choice to be Made



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

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.

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)

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.

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.