



# **NRC Perspective on Risk- Informed, Performance-Based Fire Protection Licensing Basis**

Paul Lain, PE  
NFPA 805 Program Manager  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

2010 NRC Regulatory Information Conference

# Topics

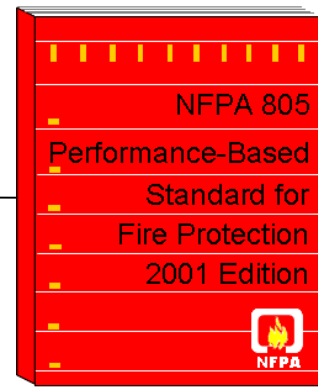
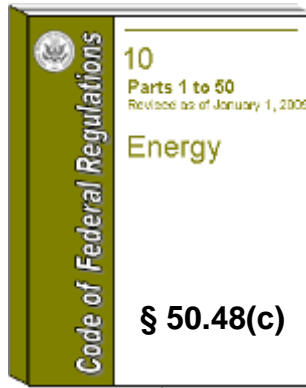
- History
- Regulatory Infrastructure
- Enforcement Discretion
- Pilot Transition Status
- Going Forward
- RIC Take-Away

# History

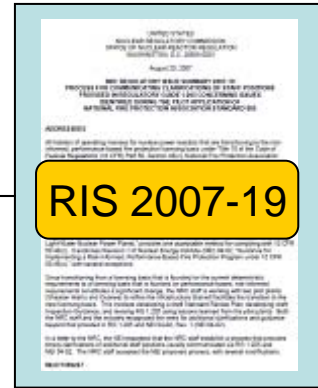
- SECY-98-0058
- NFPA 805, 2001 Edition
- 10CFR50.48(c) Rulemaking
- Interim Enforcement Policy
- Regulatory Infrastructure
- NFPA 805 Pilot Program
- NFPA 805 FAQ Program
- LAR Submittals



**NFPA 805  
Regulatory  
Infrastructure**



Incorporated  
by Reference  
(Part of Rule)



FAQ Process  
(Interim  
Staff Guidance)

Referenced



(EEEE Guidance Only)



Endorsed



(Ch 3 Circuit Analysis Only)



# Enforcement Discretion Extensions



- Sliding Deadline
  - Six Months Past the Approval of the Second Pilot Plant License Amendment Request
  - Utilize Pilot Plants Lessons Learned
- Case-by-Case Review
  - Licensees must Request Extension
  - Provide information on their transition to ensure “Substantial Progress”

# Pilot Transition Status



- Shearon Harris Nuclear Plant
  - LAR Submitted in May 2008
  - Audit Conducted in March 2009
  - Revised LAR in October 2009
  - SE in Concurrence

# Pilot Transition Status



- Oconee Nuclear Site
  - LAR Submitted in May 2008
  - Audit Conducted in February 2009
  - Revised LAR expected April 2010
  - SE completion scheduled for 3<sup>rd</sup>/4<sup>th</sup> qtr CY10

# Going Forward

- Non-Pilot Transition
  - Expecting 30 LAR submittals in FY-11
- LAR Reviews (SECY 09-0005)
  - Allow up to 2 Years for LAR Reviews
  - Provides Additional Contract Funds and FTEs for LAR Review Support



# RIC Take-Away

- NRR Senior Management encourages Licensees to submit their NFPA 805 License Amendment Request prior to Enforcement Discretion expiration.