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PROPOSED RULE PR 50
(66FR 65661)**Comments on Draft Rule Language Change to 10 CFR 50.48 Fire Protection**

Comment 1: Modify the draft rule language to add the following modification to the NFPA 805 language:

Sections 2.4.2.1. Replace the parenthetical comment referring to Appedix B to read as follows, "(Identify equipment using the method identified in Appendix B)."

Sections 2.4.2.2.1. Replace the parenthetical comment referring to Appedix B to read as follows, "(Analyze circuits using the method identified in Appendix B)."

Sections 2.4.2.2.2(a). Replace the parenthetical comment referring to Appedix B to read as follows, "(Analyze common power supply concerns using the method identified in Appendix B)."

Sections 2.4.2.2.2(b). Replace the parenthetical comment referring to Appedix B to read as follows, "(Analyze common enclosure concerns using the method identified in Appendix B)."

Sections 2.4.2.3. Replace the parenthetical comment referring to Appedix B to read as follows, "(Identify equipment and cable locations using the method identified in Appendix B)."

Sections 2.4.2.4. Replace the parenthetical comment referring to Appedix B to read as follows, "(Perform fire area assessments using the method identified in Appendix B)."

Justification: As these sections of provide direction related to the deterministic methods to achieve the nuclear safety performance criteria in Chapter 1 of NFPA 805, they should provide a clear and consistent methodology to perform the required tasks. Appendix B provides this methodology. The nuclear fire protection community has been sorely lacking a written accepted approach regarding these issues. As a result, a significant degree of inconsistency in analysis has plagued the industry for years. If Appendix B methodologies are considered "required" as opposed to "information only" inconsistencies will be minimized for those plants that choose to adopt this new licensing approach. This will inevitably make compliance easier for the industry and enforcement easier for the regulator.

Comment 2: Delete italicized text at the beginning of Appendix B.

Justification: See reasoning for Comment 1 above.

Submitted by:

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