

Risk-Informed, Performance- Based Fire Protection Implementing Guidance

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Topics

- **Licensee NFPA 805 configuration baselining process**
- NFPA 805 adoption transition letter content
- Industry responses to NRC comments on implementing guidance outline
- Rulemaking issue resolution pathway and schedule

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Configuration Baselining

- Configuration baselining
 - Is part of the decision-making process for making the transition to NFPA 805
 - Addresses Chapter 3 elements only
- Configuration baselining includes
 - Systematic review of current licensing basis
 - Determination of an "optimal" final licensing basis
 - Addressing current noncompliances related to Chapter 3

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ATTACHMENT 2

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Configuration Baselineing

- Determining an "optimal" final licensing basis:
 - Review NFPA 805
 - Determine fundamental elements of 805 to be adopted
 - Determine elements of current LB to be brought forward
 - Includes exemptions and deviations
 - Determine "new" proposals or methods needed; evaluate against 805 performance requirements
 - Review 86-10 and 50.59 evaluations against 805 performance requirements
 - Determine optimal method for addressing regulatory issues in the future (deterministic or R/PB)



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Transition Letter Content

- Transition letter is deemed to be the license amendment submittal
- An NRC response will be requested
 - Level of response detail to be addressed



Transition Letter Content

- Expected elements of the transition letter
 - Date for full compliance
 - Milestones for partial compliance
 - Text of new license condition
 - Significant elements of new licensing basis, with analysis or justification as appropriate
 - Existing "approved" licensing basis elements brought forward to supersede Section 3 fundamental elements
 - Proposed exceptions to NFPA 805
 - Summary of retained documentation (not submitted)

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Industry Responses to NRC Comments on Guidance Outline

- Significant comments/responses:
 - Use of NFPA 805 tools by licensees retaining current LB (Comment # 6)
 - Submitted vs retained document requirements (# 16)
 - Use of current licensing basis elements in new licensing basis (# 13)
- See NEI letter for complete responses
 - To be provided by 2/27

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Rulemaking Issue Resolution

- Identify
 - Remaining issues
 - NRC/industry interactions needed to address and resolve issues
 - Schedule for interactions
 - Impact on rulemaking schedule
 - Impact on implementing guidance schedule

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