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Rules and Directives Branch
Office of Administration
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on Draft Regulatory Guide DG-1139, Risk-Informed, Performance-Based Fire Protection For Existing Light-Water Nuclear Power Plants (69 FR 60192).

Ladies and Gentlemen:

On October 7, 2004, the NRC published in the Federal Register (69 FR 60192) a notice that a new draft regulatory guide, DG-1139, entitled "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," was available for comment.

Enclosed are the comments of Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), and Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF).

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Groblewski'.

Tony Groblewski
Supervisor - Regulatory Affairs

HAS
Enclosure

Comments on Draft Regulatory Guide DG-1139
Risk-Informed, Performance-Based Fire Protection
for Existing Light-Water Nuclear Power Plants

1. Section 3.1.2 indicates that the evaluation of fire protection program changes should demonstrate that adequate defense-in-depth is maintained. It is suggested that the inclusion of examples of acceptable defense-in-depth analysis would promote better understanding of the limits of such evaluations.
2. A well-understood licensing basis needs to be an end product of the transition to a risk-informed, performance-based fire protection program. Known differences in understanding of the current licensing basis between the NRC and the licensee need to be explicitly addressed for every major area of fire protection. Therefore, it is suggested that a transition summary document, as described in NEI 04-02, needs to be submitted as part of the license amendment for each plant.