

August 10, 2006

Ms. Patricia Schroeder
Standards Administrator
American Nuclear Society
Risk-Informed Standards Consensus Committee
555 North Kensington Avenue
LaGrange Park, Illinois 60526

Dear Ms. Schroeder,

On April 21, 2006, draft American Nuclear Society (ANS) standard, BSR/ANS-58.23, "Fire Probabilistic Risk Assessment Methodology Standard," was made available for public review and comment. We are pleased to have an opportunity to comment on this draft.

Quality of probabilistic risk assessment (PRA) is a central issue to risk-informed regulation. A phased approach to PRA quality was developed in SECY-04-0118, "Plan for the Implementation of the Commission's Phased Approach to Probabilistic Risk Assessment Quality," for achieving an appropriate quality for PRAs for risk-informed decisionmaking. This Fire PRA Standard is crucial to achieving the goals of the phased approach. The Standard will support the NRC staff in performing a more focused technical review of the PRA, and contribute to safety of decisions and efficient use of both NRC and industry resources.

The staff has reviewed the subject Standard using our criteria developed in Regulatory Guide 1.200 For Trial Use, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," dated February, 2004.

The following is an overall summary of NRC's comments.

- The Fire PRA Standard is, for the most part, well-written and addresses important issues that need to be addressed when performing a fire PRA.
- Discussion notes provided in the Standard are particularly useful for explaining the supporting level requirements, thereby reducing the potential for misinterpretation.
- Our comments relate to scope, clarification, the relationship with the ASME internal events PRA Standard, interpretation, and strengthening of requirements in this standard.

General and detailed comments are provided in the enclosure.

The major concern expressed in General Comment #3 is in regard to the relationship of the Fire PRA Standard with the ASME PRA Standard. It is our understanding that the ASME PRA Standard is to serve as the basis for developing the plant response model in the Fire PRA. The Fire PRA Standard provides the requirements that need to be performed in addition to, or different from, those requirements in the ASME PRA Standard.

This relationship is not clear in the Fire PRA Standard and the enclosed general comment provides examples illustrating our concern. We believe this issue is more efficiently and effectively resolved via an integrated standard. Therefore, we recommend that the Fire PRA Standard be issued as part of the ASME/ANS integrated PRA standard, in lieu of a separate, stand-alone standard, if this can be done without significantly affecting the schedule.

We hope that these comments will assist in the development of the final standard. It is our intent to continue to support this crucial initiative. If you have any questions, please contact Dr. J.S. Hyslop, of my staff, at (301) 415-6354.

Sincerely,

/RA/ F. Eltawila

Farouk Eltawila, Director
Division of Risk Assessment and Special Projects
Office of Nuclear Regulatory Research

Enclosure:
As stated

cc: William Burchill, ANS RISC Committee Chair
Dennis Henneke, Fire PRA Standard Working Group Chair
J. Wiggins/B. Sheron, RES
J. Dyer, NRR
M. Weber, NRR
G. Holahan, NRR/ADRA

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