

# Fire Protection Inspections and Issues

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# Topics

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- ❑ NFPA 805 initiative
- ❑ Operator Manual Actions
- ❑ Post-Fire Safe Shutdown Circuit Analysis
- ❑ Fire Protection Inspection Issues
- ❑ Unresolved Fire Protection items

# Risk-Informed and Performance Based NFPA 805

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- ❑ NFPA 805 is voluntary alternative to the fire protection rule, while maintaining safety and reducing unnecessary regulatory burden
- ❑ 11 nuclear licensees sent NRC letters of intent to transition 40 nuclear plants to NFPA 805
- ❑ Region III sites:
  - FENOC – Perry, Davis Besse
  - NMC – Point Beach, Palisades, Prairie Island, Monticello
  - FPL – Duane Arnold
  - AEP – D.C. Cook



# Risk-Informed and Performance Based NFPA 805 - continued

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- ❑ NFPA Transition requires of use of a Fire PRA and Fire modeling tools to evaluate plant ability to achieve safe shutdown conditions following a fire
- ❑ NFPA is alternative approach to deterministic compliance with Appendix R
- ❑ NRC providing Enforcement Discretion for existing non-willful, non-Red risk significance findings



# Operator Manual Actions

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- Issue:
  - NRC reviewed and approved operator manual actions as acceptable methods to safely shutdown plant
  - Some licensees rely upon manual actions which were not reviewed and approved by NRC
- RIS 2006-10, Regulatory Expectations With Appendix R Paragraph III.G.2 Operator Manual Actions, issued in June 2006.
- RIS discusses pending issuance of Enforcement Guidance and need for compensatory actions, where unapproved manual actions are relied upon



# Post-Fire Safe Shutdown Circuit Analysis

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- Issue:
  - Potential fire-induced electrical circuit failures could prevent operation of equipment necessary to achieve and maintain safe shutdown
- RIS 2005-030, "Clarification of Post-Fire Safe-Shutdown Circuit Regulatory Requirements" provides clarification of regulatory requirements related to post-fire safe-shutdown circuit analysis
- Generic Letter is expected to be issued in 2006 regarding circuit analysis and spurious actuations.



# Fire Protection Inspection Issues

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- ❑ Region III continues to focus on Appendix R circuits and operator manual actions
- ❑ Current RIS documents and pending Generic Letter regarding circuits laying regulatory groundwork for issue resolution
- ❑ Operator manual actions must be feasible and reliable
- ❑ Plants in NFPA 805 transition are subject to Enforcement Discretion
- ❑ Risk evaluations of inspection and licensee-identified findings can be complex



# Unresolved Fire Protection items

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- ❑ Number of open items remain open pending regulatory resolution of circuit issues and operator manual actions
- ❑ Open items for plants in transition to NFPA may remain open for some time
- ❑ Region actively working to schedule site inspections to resolve other open items not directly-related to circuits and manual actions





# Fire Protection Inspections and Issues

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- Questions ?
- Comments ?