

This FAQ is attempting to address three different major issues:

1. Define the bounds of the Fire Protection Program (includes the definition of Change)
2. How FPP-Related and FPP-Unrelated changes will be handled
3. How the Fire PRA will be handled with respect to the FPP

Staff Recommendation:

We would like to see the FAQ divided up into three different FAQs on these different topics. If this is done, item 3 can be addressed very quickly. We agree in concept that the Fire PRA should not be considered part of the FPP.

Item 1 involves much more than just the PRA and those items that are required to meet NFPA 805 Chapters 3 and 4. More discussion will be required in how this will be bounded, as well as how the result will be documented in the Transition Report and the License Amendment Request.

Item 2 can not be addressed until item 1 is completed since examples of related and unrelated changes can only be defined once the bounds have been established.