

# PUBLIC SUBMISSION

As of: February 06, 2012  
 Received: February 04, 2012  
 Status: Pending\_Post  
 Tracking No. 80fadb1b  
 Comments Due: March 01, 2012  
 Submission Type: Web

**Docket:** NRC-2011-0295  
 Methodology for Low Power/Shutdown Fire PRA

**Comment On:** NRC-2011-0295-0001  
 Methodology for Low Power/Shutdown Fire PRA

**Document:** NRC-2011-0295-DRAFT-0002  
 Comment on FR Doc # 2011-33471

12/09/2011  
 76 FR 81998

(2)

## Submitter Information

**Name:** Doug True  
**Address:**  
 2001 N. Main Street  
 Suite 510  
 Walnut Creek, CA, 94507  
**Organization:** ERIN Engineering and Research, Inc.

RECEIVED

2012 FEB -6 AM 8:09

RULES AND LECTIVES  
 BRANCH  
 10/1/12

## General Comment

This document is premature and should be withdrawn.

A more appropriate course would be for the appropriate Standards Development Organization, in this case the ASME/ANS Joint Committee on Nuclear Risk Management, to first define the requirements that would be part of a draft Standard for low power and shutdown fire PRA, then develop the guidelines to meet those requirements, then pilot those guidelines in an appropriate number of pilots to effectively exercise the technical methods outlined in guidelines and requirements, then revise the draft Standard and guidelines BEFORE issuance of the final guideline document.

Failure to follow such a process will lead to the same problems that were introduced when the NRC issued NUREG/CR-6850 prior to (a) a Standard being developed, (b) appropriate piloting, and (c) incorporation of the lessons learned from pilots.

SUNSI Review Complete  
 Template = ADM-013

ERIDS = ADM-03  
 Add = F. Gonzalez (feg)