

FAQ Number 12-0063 FAQ Revision 0

FAQ Title FIRE BRIGADE MAKE-UP

Plant: Progress Energy- Fleet Date: February 21, 2012

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### **Purpose of FAQ:**

The NRC is revising the Emergency Preparedness Rule (10 CFR Part 50, Appendix E). The purpose of this FAQ is to provide clarification of the fire brigade staffing and qualification while maintaining compliance with the amended Emergency Preparedness Rule (10 CFR Part 50, Appendix E). The intent is to address issues which may arise over potential impact to fire brigade staffing and meeting Section 3.4.1(c) of NFPA 805, and also including previous industry accepted guidance regarding unexpected absences of fire brigade staff for short periods of time.

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Is this Interpretation of guidance? ☒ Yes / No

Proposed new guidance not in NEI 04-02? ☒ Yes / No

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### **Details:**

**NEI 04-02 guidance needing interpretation (include section, paragraph, and line numbers as applicable):**

Some clarification is required to help the user(s) develop and maintain Fire Brigade constituency and staffing as described under NFPA 805. The clarification is based on guidance and feedback developed for the pilot and non-pilot plants. This will supplement the guidance currently in NEI 04-02, Appendix K, NFPA 805, Chapter 3 Clarifications.

**Circumstances requiring guidance interpretation or new guidance:**

Based on industry feedback, and in light of concurrent regulatory development impacting the guidance associated with 10 CFR 50.48(c).

**Detail contentious points if licensee and NRC have not reached consensus on the facts and circumstances:**

None

**Potentially relevant existing FAQ numbers:**

None

**Response Section:**

**Proposed resolution of FAQ and the basis for the proposal:**

See specific revisions listed below.

***If appropriate, provide proposed rewording of guidance for inclusion in the next Revision:***

See revisions to NEI 04-02, Appendix K, NFPA 805 Chapter 3 Clarifications

Modify as follows (provide additional text as described).

NFPA 805 Section 3.4 states in part the following:

***3.4.1 On-Site Fire-Fighting Capability.*** *All of the following requirements shall apply.*

*(a) A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site. This force shall have a minimum complement of five persons on duty and shall conform with the following NFPA standards as applicable:*

*(1) NFPA 600, Standard on Industrial Fire Brigades (interior structural fire fighting)*

*(2) NFPA 1500, Standard on Fire Department Occupational Safety and Health Program*

*(3) NFPA 1582, Standard on Medical Requirements for Fire Fighters and Information for Fire Department Physicians*

*(b)\*Industrial fire brigade members shall have no other assigned normal plant duties that would prevent immediate response to a fire or other emergency as required.*

*(c) During every shift, the brigade leader and at least two brigade members shall have sufficient training and knowledge of nuclear safety systems to understand the effects of fire and fire suppressants on nuclear safety performance criteria.*

*Exception to (c): Sufficient training and knowledge shall be permitted to be provided by an operations advisor dedicated to industrial fire brigade support.*

*A.3.4.1(b)Immediate response as listed in these sections is considered to be achieved if nominal actions are taken to put associated equipment in a safe condition.*

Where used, the fire brigade make-up described under NFPA 805 Section 3.4.1, is intended to include a five-person firefighting team in which all five members are trained and equipped to extinguish fires.

In light of recent changes to 10 CFR 50 Emergency Plan requirements, and in concert with the existing requirements of NFPA 805 Section 3.4.1(b), the five assigned fire brigade members shall have no other assigned normal plant duties that would prevent immediate response to a fire or other emergency as required. This would exclude the fire brigade members from assignment to on-shift ERO positions (other than fire brigade). Further, the licensed RO/SRO positions, and

the STA position assigned to the on-shift ERO, would likewise not be assigned to the fire brigade.

Where NFPA 805, section 3.4.1(c), Exception to (c), allows for “sufficient training and knowledge shall be permitted to be provided by an operations advisor dedicated to industrial fire brigade support”. The operations advisor, in addition to the five-person fire brigade, will have no other on-shift ERO assignment that would prevent immediate response to a fire or other emergency as required. Likewise provision of the operations advisor position, when utilized, will not overburden the on-shift staffing such that all ERO operational functions are not met during an emergency involving both a fire event and other plant emergency response.

In addition, licensees should consider conditions where the fire brigade complement may be less than the minimum requirement for a period of time, in order to accommodate unexpected absence of on-duty shift members.

Licensees may claim prior approval if their current technical specifications or fire protection safety evaluation address the issue.

If prior approval has not been granted, the licensee should seek NRC approval in the NFPA 805 LAR.

The following is typical wording found in existing fire protection programs

*The Shift Fire Brigade Team may be one less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift complement to within the minimum requirements.*