

Draft Criteria for Reviewing NFPA 805
LAR for SUNSI Requirements
(Redaction)
Industry Comments (2/17/12 Conf Call)

- No clear guidance on how to implement
 - The criteria is still very subjective
 - Industry may default to a conservative approach
- Will past submittals require a revision if the draft criteria is approved and implemented?
- Concerns on cumulative effects of previous data posted
 - Compile sensitive plant information
- What is the process and time frame for the Draft Criteria to be implemented?
- Some of the licensees think existing criteria in other guidance documents may be more restrictive:
 - RIS 2005-26
 - SECY 04-0191
 - SECY 05-0091
 - Com SECY 05-0054
- Today, should the industry follow the draft guidance or the RIS/SECY?
- LAR template revision may be needed to change attachment headers
 - Header statement – Security Related Information – Withhold Under 10 CFR 2.390
 - Attachment C - B-3 Fire Area Transition
 - Attachment D - Non Power Ops
 - Attachment G - Recovery Actions
 - Attachment S - Plant Modifications and Items to be Completed
 - Attachment W - Fire PRA Insights
 - One utility considering LAR submittal all attachments above following draft criteria
- Utilities typically do not request their security organization to review LAR submittals
 - Two Licensees on the conference call had LAR submittal reviewed by their security organization
 - These two security organizations were concerned with information submitted
 - Force on Force scenarios developed on Fire PRA target sets