

July 30, 2012

MEMORANDUM TO: Alexander R. Klein, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Charles E. Moulton, Fire Protection Engineer */RA/*
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JUNE 28, 2012, CATEGORY 1 MEETING
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805: NUCLEAR REGULATORY COMMISSION/NUCLEAR
ENERGY INSTITUTE MANAGEMENT DISCUSSION

On June 28, 2012, the U.S. Nuclear Regulatory Commission (NRC) Division of Risk Assessment (DRA) management held a meeting with Nuclear Energy Institute (NEI) management to discuss questions requiring management attention related to National Fire Protection Association (NFPA) Standard 805.

The participants discussed, at a high level, the following topics:

- Communication
 - DRA management stated that open communication is very important to the success of the NFPA 805 program.
 - DRA management stated that public meetings, like the current meeting, are an important part of the communication effort.
 - DRA management solicited suggestions from NEI and other stakeholders for improving communications.
 - NEI representatives responded that clearly communicating the NRC's expectations of licensees should be the agency's priority.
- NRC progress in reviewing NFPA 805 non-pilot applications
 - DRA management stated that the current reviews are going well.
 - DRA management stated that some of the current applications have significant differences from the pilot applications and can be more complex, as well.
- NFPA 805 review schedule
 - DRA management stated that additional review efficiencies are being sought.
 - NEI representatives requested that more detail be provided concerning the later stages of the NFPA 805 review schedule.
 - DRA management stated that preliminary information would be presented at the next meeting.

CONTACT: Charles Moulton, NRR/DRA
(301) 415-2751

- The NRC staff stated that staff contact with a licensee regarding scheduling the audit prior to the completion of the acceptance review does not indicate that the application has been accepted for review.
- Probabilistic risk assessments (PRAs)
 - NEI representatives expressed concern about PRA quality stability and the resolution of unreviewed analysis methods (UAMs).
 - NEI representatives expressed disappointment that the NRC letter concerning UAMs did not fully address the industry panel decision that partially addressed the NRC dissent on these methods.
 - NEI representatives, DRA management, and the NRC staff discussed the role of sensitivity studies in NFPA 805 applications.
 - NEI representatives requested that the NRC issue clear guidance regarding many facets of PRA sensitivity studies including:
 - When are sensitivity studies needed?
 - What needs to be reported to the NRC?
 - What information needs to be in the LAR?
 - How will the NRC use these results?
 - What constitutes acceptability of a sensitivity study?
 - If there is a big difference, what will the NRC need?
 - DRA management agreed that further discussions would be held regarding PRA sensitivity studies.

The participants agreed that the next meeting would take place on July 24, 2012.

There were no handouts for the meeting.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

- The NRC staff stated that staff contact with a licensee regarding scheduling the audit prior to the completion of the acceptance review does not indicate that the application has been accepted for review.
- Probabilistic risk assessments (PRAs)
 - NEI representatives expressed concern about PRA quality stability and the resolution of unreviewed analysis methods (UAMs).
 - NEI representatives expressed disappointment that the NRC letter concerning UAMs did not fully address the industry panel decision that partially addressed the NRC dissent on these methods.
 - NEI representatives, DRA management, and the NRC staff discussed the role of sensitivity studies in NFPA 805 applications.
 - NEI representatives requested that the NRC issue clear guidance regarding many facets of PRA sensitivity studies including:
 - When are sensitivity studies needed?
 - What needs to be reported to the NRC?
 - What information needs to be in the LAR?
 - How will the NRC use these results?
 - What constitutes acceptability of a sensitivity study?
 - If there is a big difference, what will the NRC need?
 - DRA management agreed that further discussions would be held regarding PRA sensitivity studies.

The participants agreed that the next meeting would take place on July 24, 2012.

There were no handouts for the meeting.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

DISTRIBUTION:

DRA R/F	AKlein	PLain	APearson	HPeterson, RIII	MKing, RII
CMoulton	HBarrett	DHarrison	GMiller, RIV	JRogge, RI	BBeasley

ADAMS Accession No.: ML122160386

Office	NRR/DRA/AFP	NRR/DRA/APLA	NRR/DRA/AFP
Name	CMoulton	BBeasley	AKlein
Date	07 / 25 /12	07/ 30 /12	07 / 27 /12

OFFICIAL RECORD COPY

**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
FREQUENTLY ASKED QUESTIONS PROCESS
LIST OF ATTENDEES**

June 28, 2012

U. S. Nuclear Regulatory Commission Staff

A. Klein
A. Pearson
C. Moulton
H. Barrett
J. Giitter
S. Dinsmore
S. Lee
S. Wong

Stakeholders

A. Hazelhoff (ENERCON)
A. Ratchford (Kleinsorg Group)
B. Najafi (EPRI)
B. Simril (TVA)
D. Rao (Entergy)
F. dePeralta (Tri-en Corp)
J. Butler (NEI)
J. Ertman (Progress)
J. Gregerson (Tri-en Corp)
J. McWhorter (Entergy)
J. Walker (Kleinsorg Group)
K. Smith (Entergy)
M. Fletcher (AmerenUE)
M. Lilley (Constellation)
M. McKeown (Xcel Energy)
P. Boulden (Appendix R Solutions)
P. Crowe (Entergy)
P. Mazzaferro (Constellation)
P. Ouellette (EPM)
R. Layton (PNNL)*
R. Nance (Entergy)
S. Meyer (STARS)
T. Maness (NEI)
V. Anderson (NEI)
V. Rubano (FPL)

* participated via phone

ENCLOSURE