

May 6, 2013

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 APRIL 25, 2013, CATEGORY 2 MEETING  
REGARDING NATIONAL FIRE PROTECTION ASSOCIATION  
STANDARD 805: NUCLEAR REGULATORY COMMISSION/NUCLEAR  
ENERGY INSTITUTE MANAGEMENT DISCUSSION

On April 25, 2013, 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 Standard 805 (NFPA 805).

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

- Discussion of issues related to the LAR reviews and safety evaluation issuance
  - DRA management stated that the first non-pilot safety evaluation is being prepared for issuance in the next few months.
  - DRA management stated that efficiencies are being explored for the final processing of safety evaluations
  - DRA management stated that one such efficiency would be a dedicated project manager to assist in processing the safety evaluations
  - NEI representatives stated that early communication on these topics would be key to success of the over-all effort by minimizing surprises late in the process:
    - Discussion of license condition elements
    - Adequacy of responses to requests for additional information (RAIs)
  - NRC staff stated that they would look into how best to communicate RAI response adequacy to licensees.
  - NRC staff stated that discussing the license condition with the licensee was already a part of finalizing the safety evaluation, and such communication was starting to happen with the early non-pilot applicants (i.e., DC Cook).

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

- Discussion of issues concerning probabilistic risk assessments (PRAs)
  - DRA management asked about progress in implementing the industry PRA methods review panel
  - NEI representatives stated that they expected that new industry resources would be brought to bear to get that process moving.
  - NEI representatives asked about a PRA-related document that had been potentially improperly publicly released.
  - NRC staff stated that they would look into the issue.
- DRA management asked whether any additional licensees were considering transition to NFPA 805.
  - NEI representatives stated that they did not know of any, but that they would look into it.
- NRC schedule for completing NFPA 805 application reviews
  - NRC staff stated that rows for the Browns Ferry, Ginna, St. Lucie, and San Onofre applications had been added to the schedule matrix.
  - NRC staff stated that these schedules would be filled in once each application was officially accepted for review.

The participants agreed that the next meeting would be a teleconference on May 23, 2013.

The meeting handout is available in the Agencywide Documents Access and Management System. The review completion schedule is available at accession number ML13119A030.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:  
As stated

- Discussion of issues concerning probabilistic risk assessments (PRAs)
  - NEI representatives proposed a definition of “deviation from NUREG/CR-6850”
    - Deviation from NRC-accepted Fire PRA methods for NFPA 805 applications: An approach, method, or data, which is unique to Fire PRA and specific to 10 CFR 50.48(c), that differs from that explicitly described in NRC-accepted documents related to FPRA methods.
  - NEI representatives expressed concern regarding the timing of the resolution of PRA credit for very early warning fire detection systems (incipient detection).
    - DRA management suggested that system performance data was available to the manufacturers and also suggested that the industry should attempt to obtain it
    - NEI representatives agreed
  - NEI representatives stated that a path forward should be developed for low significance unreviewed analysis methods (UAMs) for PRAs.
    - Participants agreed to add this as an agenda item for the next meeting.
- NEI representatives asked about the possibility of holding a transition workshop in the summer of 2013.
  - The NRC staff stated that there were currently not enough open questions in light of the amount of effort required to hold a workshop.
    - Participants agreed that the idea of a workshop would continue to be discussed at future meetings.

The participants agreed that the next meeting would be a teleconference on April 25, 2013.

The meeting handout is available in the Agencywide Documents Access and Management System. The review completion schedule is available at accession number ML13119A030.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:  
As stated

**DISTRIBUTION:**

DRA R/F	AKlein	PLain	APearson	RDaley, RIII	MKing, RII
CMoulton	HBarrett	HHamzehee	GMiller, RIV	JRogge, RI	

**ADAMS Accession No.: ML13120A097**

Office	NRR/DRA/AFP	NRR/DRA/APLA	NRR/DRA/AFP
Name	CMoulton	HHamzehee	AKlein
Date	04 / 30 /13	04 / 06 /13	04 / 02 /13

**OFFICIAL RECORD COPY**

**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805  
NRC/NEI MANAGEMENT DISCUSSION  
LIST OF ATTENDEES**

April 25, 2013

<b>U. S. Nuclear Regulatory Commission Staff</b>	<b>Stakeholders</b>
--	---------------------

A. Pearson  
C. Moulton  
H. Barrett  
H. Hamzehee  
J. Giitter  
J. Robinson\*  
L. Fields  
S. Dinsmore

A. Afzali (Southern)\*  
A. Hazelhoff (ENERCON)\*  
A. Ratchford (Kleinsorg Group)\*  
E. Kleinsorg (Kleinsorg Group)\*  
F. dePeralta (Tri-en Corp)\*  
F. Mantine (First Energy)\*  
G. Harris (AmerenUE)\*  
J. Butler (NEI)\*  
J. Chapman (Sciencetech)\*  
J. Ertman (Duke)\*  
K. Zee (ERIN)\*  
L. Hughes (Southern Nuclear)\*  
M. Lilley (Constellation)\*  
P. Amico (SAIC)\*  
R. Nance (Entergy)\*  
S. Einbinder (Excel Energy)\*  
S. Weimer (Entergy)\*  
T. Stanton (PG&E)\*  
V. Anderson (NEI)\*  
V. Rubano (FPL)\*

\* participated via phone

ENCLOSURE