

NRC High Level Remarks – Fire PRA FAQ 13-0002: Modeling of MCR abandonment

- 1) We acknowledge enhancements to the existing NUREG-1921 process in the proposed FAQ solution since scenarios typically outside those from traditional remote shutdown analyses are addressed. (See the 1st paragraph in section 3.1 where you acknowledge no credit should be given for ATWS, LOCA, ISLOCA, or MSLB). Also you have postulated premature abandonment as a failure mode. However, much of the proposed FAQ solution is a framework and seems to reiterate much of NUREG-1921. Please indicate how you have enhanced NUREG-1921 or otherwise enhanced our state of knowledge through this proposed solution.
- 2) The decision to abandon the MCR upon a loss of control is a scenario specific issue, and does not lend itself to a generic failure probability for the decision. This needs to be discussed.
- 3) Partial abandonment of the MCR is a likely condition given a fire leading to loss of control. Again this is a scenario specific issue and needs to be discussed.
- 4) The discussion and assignment of capability categories from the ASME/ANS PRA Standard needs to be removed from the proposed FAQ solution as FAQ solutions develop or clarify fire PRA methods, not additionally how they measure to the Standard