



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 8, 2014

Mr. Mano Nazar  
President and Chief Nuclear Officer  
Nuclear Division  
NextEra Energy  
P. O. Box 14000  
700 Universe Boulevard  
Juno Beach, FL 33408-0420

SUBJECT: ST. LUCIE PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL  
INFORMATION ON LICENSE AMENDMENT REQUEST TO ADOPT  
NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805,  
PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION  
(TAC NOS. MF1373 AND MF1374)

Dear Mr. Nazar:

By letter dated March 22, 2013, as supplemented by letters dated June 14, 2013, and February 24, March 25, and April 25, 2014, Florida Power & Light Company (the licensee) submitted a license amendment request for the St. Lucie Plant, Unit Nos. 1 and 2 (St. Lucie). The proposed amendment requested approval to transition the fire protection licensing basis from Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(b) to 10 CFR 50.48(c), National Fire Protection Association Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants."

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the information provided by the licensee and participated in an audit at St. Lucie the week of November 18, 2013. By correspondence dated June 7 and December 26, 2013, the NRC staff requested additional information. By letters dated June 14, 2013, and February 24, March 25, and April 25, 2014, the licensee responded to those requests.

The NRC staff determined that it needs additional information to complete the review. The enclosure to this letter contains the NRC staff's Request for Additional Information (RAI). By an electronic mail dated July 30, 2014, Ms. Roseann Conrad of your staff proposed the following schedule to respond to the NRC staff followup Probabilistic Risk Assessment (PRA) RAIs and the NRC staff agreed.

The first batch on or before September 12, 2014:

PRA RAI 04.c.01a and b  
PRA RAI 15.01  
PRA RAI 17.b.01  
PRA RAI 18  
PRA RAI 01.d.01  
PRA RAI 01.m.01  
PRA RAI 11.g.01

The second batch on or before October 10, 2014:

PRA RAI 01.g.01  
PRA RAI 02.b.01  
PRA RAI 03.c.01  
PRA RAI 05.01  
PRA RAI 07.01  
PRA RAI 11.c.01  
PRA RAI 11.c.02a, b, and c  
PRA RAI 12.01  
PRA RAI 19.a and b  
PRA RAI 20  
PRA RAI 21.a, b, c and d

If you have any questions, please contact me at (301) 415-1447.

Sincerely,



Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
Request for Additional Information

Docket Nos. 50-335 and 50-389

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REQUEST FOR ADDITIONAL INFORMATION  
LICENSE AMENDMENT REQUEST TO ADOPT  
NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805  
PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION  
FOR LIGHT WATER REACTOR ELECTRIC GENERATING PLANTS  
FLORIDA POWER & LIGHT COMPANY  
ST. LUCIE PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-335 AND 50-389

By letter dated March 22, 2013 (Agencywide Documents and Management System (ADAMS) Accession No. ML13088A173), as supplemented by letters dated June 14, 2013, and February 24, March 25, and April 25, 2014 (ADAMS Accession Nos. ML13170A156, ML14070A097, ML14114A458, and ML14135A395, respectively), Florida Power & Light Company (the licensee) submitted a license amendment request (LAR) for the St. Lucie Plant, Unit Nos. 1 and 2 (St. Lucie). The proposed amendment requested approval to transition the fire protection licensing basis from Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(b) to 10 CFR 50.48(c), National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants."

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the information provided by the licensee and participated in an audit at St. Lucie the week of November 18, 2013. By correspondence dated June 7 and December 26, 2013 (ADAMS Accession Nos. ML13178A010 and ML13353A578, respectively), the NRC staff requested additional information. By letters dated June 14, 2013, and February 24, March 25, and April 25, 2014, the licensee responded to those requests. The NRC staff determined that it needs additional information for the following Request for Additional Information (RAI) to complete the review.

Probabilistic Risk Assessment (PRA) RAI 01.d.01

In the letter dated April 25, 2014, the licensee responded to PRA RAI 01.d. This response states that the Fire PRA imposes a failure of an operator for any scenario in which all associated cues are lost due to fire damage. Clarify whether an action is considered failed upon loss of any required cue or if loss of all such cues is necessary to fail an action.

PRA RAI 01.m.01

In the letter dated April 25, 2014, the licensee responded to PRA RAI 01.m. This response indicates that all High Energy Arcing Fault (HEAF) and oil fire scenarios are assumed to result in an hot gas layer (HGL) in the associated fire zones without credit for suppression; however, the response to fireprotection modeling (FM) RAI 01.p, which is referenced by the response to PRA RAI 01.m, indicates that HEAF scenarios in HGL multicompartment analysis (MCA) will be

Enclosure

revised to address timing considerations in NUREG/CR-6850. Clarify this apparent discrepancy regarding the treatment of HEAF scenarios by the Fire PRA.

#### PRA RAI 01.g.01

In a letter dated April 25, 2014 (Accession No. ML14135A396), the licensee responded to PRA RAI 01.g. The justification provided in this response relies on design features that do not appear to preclude miscellaneous hydrogen fires given that such features may fail, but rather potentially mitigate their severity. What is the likelihood that failures of these features could result in an explosive or flammable concentration? If this likelihood is significant, provide updated risk results as part of the integrated analysis requested in PRA RAI 21 that address miscellaneous hydrogen fires and justify your methods. The guidance in Section N.2.4 of Appendix N to "EPRI [Electric Power Research Institute]/NRC-RES Fire PRA Methodology for Nuclear Power Facilities, Final Report" (ADAMS Accession No. ML052580075) (NUREG/CR-6850) assumes room-wide damage in compartments and a conservative 10-meter (m) Zone of Influence (ZOI) estimate in larger volumes. Alternatively, the analytical methods to address the scenario types are outlined by Sections N.2.4.1 through N.2.4.3 of NUREG/CR-6850. Also, the guidance in Section N.2.4 of Appendix N offers a conservative treatment that is intended to capture these scenario types.

#### PRA RAI 02.b.01

In a letter dated March 25, 2014 (ADAMS Accession No. ML14114A459), the licensee responded to PRA RAI 02.b indicating that the Bin 4 frequency is apportioned by the number of main control board (MCB) panels. If so, provide updated risk results as part of the aggregate change-in-risk analysis requested in PRA RAI 21, applying the full Bin 4 frequency to each MCB scenario postulated per the methodology in Appendix L of NUREG/CR-6850.

#### PRA RAI 03.c.01

In the letter dated March 25, 2014, the licensee's response to PRA RAI 03.c states that propagation is not assumed for all cabinets counted as part of Bin 15. Provide updated risk results as part of the integrated analysis requested in PRA RAI 21, addressing propagation for all cabinets housing circuit voltages of 440V or greater per the methodology in Section 6 of NUREG/CR-6850.

#### PRA RAI 04.c.01

In the letter dated February 24, 2014 (ADAMS Accession No. ML14070A097), the licensee responded to PRA RAI 04.c and states that a review of transient fire experience for the past 5 years revealed two potential violations of the licensee's transient combustible control program.

- a. Characterize these violations in accordance with the guidance contained in the letter dated June 21, 2012 (ADAMS Accession No. ML12171A583), from Joseph Giitter to Biff Bradley, titled, "Recent Fire PRA Methods Review Panel Decisions and EPRI 1022993, 'Evaluation of Peak Heat Release Rates in Electrical Cabinets Fires,'" considering whether (1) these violations impact the transient fire heat release rate (HRR) determination and (2) whether they reflect isolated incidents or a more general pattern of violations.

- b. Explain how the violations impacted the transient fire HRR determination and whether they reflect isolated incidents or a more general pattern of violations.

#### PRA RAI 05.01

In the letter dated March 25, 2014, the licensee's response to PRA RAI 05 indicates that transient influencing factors have been updated to reflect guidance in Frequently Asked Question (FAQ) 12-0064 and that an "extremely low" influencing factor is applied to Unit 2, Fire Zone 51X. FAQ 12-0064, however, states that this ranking may only be applied to the main control room (MCR) provided plant procedures prohibit hot work in the MCR during power operations. Provide updated risk results as part of the integrated analysis requested in PRA RAI 21, applying ranking values to Unit 2 Fire Zone 51X consistent with guidance in FAQ 12-0064.

#### PRA RAI 07.01

In the letter dated February 24, 2014, the licensee's response to PRA RAI 07 states that transient fires are not postulated for manholes, noting that such locations are confined spaces and require special procedures for entry (e.g., work permit). The guidance in FAQ 12-0064, however, requires that transient fires, consisting of fire from transient combustible and hot work, be assumed to occur in all areas of a plant unless precluded by design and/or operation (e.g., manholes are welded shut, space too small to allow personnel access under any conditions, etc.). Provide updated risk results as part of the integrated analysis requested in PRA RAI 21, addressing transient fires for manholes consistent with guidance in FAQ 12-0064.

#### PRA RAI 11.c.01

In the letter dated March 25, 2014, listed above, the licensee's response to PRA RAI 11.c states that the method used for evaluating the change in delta core damage frequency ( $\Delta CDF$ ) and delta large early release frequency ( $\Delta LERF$ ) provides a conservative analysis of the delta risk for MCR abandonment. An overestimate of the compliant plant risk, unless offset with a similar overestimate in the variant plant risk, results in a nonconservative analysis of the delta risk. The method described applies different assumptions to the variant and the compliant plant risk estimates with an indeterminate, but most likely nonconservative, impact on the change-in-risk estimate. The results of the delta-risk evaluation for MCR abandonment documented in the LAR and experience from other NFPA 805 reviews indicate that the assumption about the probability of failing to successfully shutdown after MCR abandonment is a key assumption that can directly impact the regulatory decision.

To support resolution of this key assumption, provide the frequency (i.e., before applying the conditional core damage probabilities) for the fire-induced MCR abandonment scenario bins developed from the integrated analysis requested in PRA RAI 21. Include the total abandonment frequency for loss of MCR habitability for the compliant case, and one total frequency for loss of MCR habitability for each of the three variant case bins. If the sum of the three variant case bins is not equal to the total variant case abandonment frequency, explain why the sum differs from the total.

#### PRA RAI 11.c.02

In the letter dated March 25, 2014, the licensee's responses to PRA RAIs 10.a and 11.c appear to indicate that delta risk estimates for the Unit 1 and 2 cable spreading rooms (Fire Zones 1-57 and 2-52) are only calculated for HGL scenarios, which credit MCR abandonment due to loss of control. The delta risk associated with non-HGL scenarios, however, does not appear to be addressed. If the intent is to credit MCR abandonment due to loss of control in this manner:

- a. Provide a comprehensive and complete justification for doing so in sufficient detail such that the NRC staff can complete its review.
- b. Include a description of the cues used by operators to abandon the MCR and how the timing of these cues is determined and modeled.
- c. Additionally, confirm that the delta risk contribution from all scenarios is appropriately captured.

#### PRA RAI 11.g.01

In a letter dated March 25, 2014 (ADAMS Accession No. ML14114A458) and a letter dated April 25, 2014 (ADAMS Accession No. ML14135A395), the licensee responded to PRA RAI 11.g.ii and 01.g.ii. The response to PRA RAI 11.g.ii states that the only fire area with risk-reduction modifications credited in the post-transition plant and not the compliant plant is Fire Area 1A. Negative delta risk values, however, are reported in response to PRA RAI 11.g.iii for a scenario in Fire Area 1C. Additionally, Unit 2 MCB scenarios quantified in response to PRA RAI 02.b reveal a compliant plant risk that is greater than that of the post-transition plant. Clarify this apparent discrepancy.

#### PRA RAI 12.01

In the letter dated February 24, 2014, the licensee's response to PRA RAI 12 confirmed that the conservative estimates of the risk associated with operator action dependencies can result in the failure to credit systems otherwise available to the compliant plant and, thus, produce an artificially conservative compliant plant risk that could be equivalent to, or even greater than, the post-transition plant risk, even in those fire areas without risk-reduction modifications. In an attempt to demonstrate that the resulting nonconservatism has an "exceedingly small" or no impact to delta risk for all fire areas, the response draws upon an example scenario that has negligible risk significance (at approximately  $3.3\text{E-}09/\text{year}$ ) and is in a fire area that only contributes about 0.15 percent and 0.3 percent to the total fire CDF and total  $\Delta\text{CDF}$ , respectively. Additionally, the conclusions drawn from the licensee's review of the example cutsets provided do not fully address all conservatisms in the compliant plant associated with operator action dependencies that result in nonconservative delta risk estimates. For example, Cutset No.1 demonstrates that actions represented by logic model labels CHFPRCTRP and NHFPMANUALR, while they appear to have medium dependency in the post-transition plant, are more conservatively assumed to be completely dependent in the compliant plant. Additionally, Cutset No. 3 shows that the long-term action logic model label JHFPSCDS to initiate shutdown cooling is very conservatively considered in the compliant plant to be completely dependent upon the early action logic model label CHFPRCTRP to trip the reactor coolant pumps on loss of Circulating Cooling Water.

Given that conservatisms in the compliant plant were not shown to be justifiably insignificant, resolve the nonconservatisms in delta risk associated with operator action dependencies for all fire areas, and incorporate this resolution into the integrated analysis requested in PRA RAI 21.

#### PRA RAI 15.01

The American Society of Mechanical Engineers (ASME) and American Nuclear Society (ANS) standard ASME/ANS RA-Sa-2009, "Addenda to ASME/ANS RA-S-2008, Standard for Level 1 /Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," calls for a focused-scope peer review for PRA upgrades, where PRA upgrade is defined as:

"The incorporation into a PRA model of a new methodology or significant changes in scope or capabilities that impact the significant accident sequences or the significant accident progression sequences."

The NRC staff observed the following:

- In the letter dated April 25, 2014, the licensee responded to RAI 01.o and stated that revisions made to the human reliability analysis (HRA) employ the same HRA methodology used for the internal events PRA model, and as such, a focused-scope peer review of the Fire PRA HRA is not warranted. The NRC staff noted that both fire- and nonfire-specific human failure event, however, have been updated in accordance with NUREG-1921, an accepted methodology for conducting a fire HRA not previously employed by either the internal events or Fire PRA.
- In the letter dated February 24, 2014, the licensee's response to PRA RAI 15.c indicates that the time-dependent damage accrual methodology described in response to PRA RAI 01.m and FM RAI 02.e is not a PRA upgrade; however, the NRC staff noted that even if consistent with accepted methods (e.g., Appendix H of NUREG/CR-6850), the use of this methodology in the Fire PRA and its associated impact on Fire PRA scenario development has yet to be peer-reviewed.
- In the letter dated February 24, 2014, the licensee responded to PRA RAI 15.c and stated that the update to fire scenario ZOIs to address the effects of secondary combustibles through use of the FLASH-CAT model, an "NRC-validated data methodology," is not a PRA upgrade; however, the NRC staff noted that the use of this methodology in the Fire PRA and its associated impact on Fire PRA scenario development has yet to be peer-reviewed.

Describe the method that will be used to ensure that any PRA upgrade will be peer-reviewed prior to using the model for post-transition change evaluations.

#### PRA RAI 17.b.01

In the letter dated March 25, 2014, the licensee's response to RAI 17.b indicated that some joint human error probabilities (HEP's) (including some from the internal events PRA) are assigned values less than  $10^{-5}$ . It is not clear from the response if any of the joint HEPs with values less

than  $10^{-5}$  are included in the fire scenarios (including those from the internal events PRA). It is also not clear whether the single justification provided applies to all the joint HEPs and what the value being justified is.

- a. Identify how many joint HEPs in the fire scenarios have values less than  $10^{-5}$  and provide the range of values.
- b. Summarize the different justifications (these may be grouped) used for these values.

#### PRA RAI 18

In the letter dated April 25, 2014, the licensee provided revisions to LAR Attachment W, Table W-1 and reported a total plant risk that meets the Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," Revision 2, May 2011 (ADAMS Accession No. ML100910006) risk acceptance guidelines for Region II. However, the NRC staff noted that no basis is provided for the revised seismic estimates and that use of the NRC Generic Issue 199 "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern United States on Existing Plants" (ADAMS Accession No. ML051600272), to determine the seismic CDF estimate ( $4.6\text{E-}5/\text{yr}$ ) discussed in PRA RAI 13 results in exceeding the risk acceptance guidelines for total plant CDF and suggests a similar exceeding value for total plant LERF. Provide the technical basis for the reported seismic risk.

#### PRA RAI 19

In the letter dated April 25, 2014, the licensee provided revisions to LAR Attachment W, Tables W-6 and W-7 however, it is unclear that all observed changes in risk estimates for Units 1 and 2 are associated with the resolution of an RAI. Provide the following:

- a. A summary of any Fire PRA modeling changes or refinements unrelated to the resolution of an RAI.
- b. An explanation of the following anomalies identified in the revised tables, and include, as applicable, a discussion of the individual fire areas that may contribute to each anomaly:
  - i. The total  $\Delta\text{LERF}$  reported for Unit 1 exceeds RG 1.205 risk acceptance guidelines.
  - ii. The total fire CDF for Unit 1 decreased, whereas the total  $\Delta\text{CDF}$ ,  $\Delta\text{LERF}$  and fire LERF increased.
  - iii. Delta risk for Fire Areas 1A and 1C increased such that the risk estimates for these areas are no longer negative.
  - iv. The total fire risk and delta risk estimates for Unit 2 show a marked decrease from the original LAR estimates, whereas the Unit 1 estimates, with the exception of total fire CDF exhibit an increase.



- v. A number of individual fire areas show potentially significant decreases in CDF, LERF,  $\Delta$ CDF and/or  $\Delta$ LERF, with a greater number of them being associated with Unit 2. These include, but are not limited to, Fire Areas 1D, 1J, 2B, 2CC, 2D, 2DD, 2EE, 2HH, 2II, 2J, 2KK, 2M, 2MM, 2N, 2NN, 2P, 2PP, and 2RR.

#### PRA RAI 20

In LAR Attachment V, the disposition to Fact and Observation (F&O) FSS-G1-01 appears to indicate that unless fixed openings are identified, a single failure probability of Type I barrier is applied to all MCA scenarios; however, the NRC staff noted that doing so may be nonconservative when more than one type of barrier exists.

Provide updated risk results or an evaluation indicating that no change in values is expected as part of the aggregate change-in-risk analysis requested in PRA RAI 21, summing the barrier failure probabilities for each type of barrier present per NUREG/CR-6850.

#### PRA RAI 21

Section 2.4.3.3 of the NFPA 805 standard incorporated by reference into 10 CFR 50.48(c) states that the probabilistic safety assessment (PSA) (PSA is also referred to as PRA) approach, methods, and data shall be acceptable to the authority having jurisdiction, which is the NRC. RG 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," identifies NUREG/CR-6850, NEI [Nuclear Energy institute] 04-02, Revision 2, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c) "Fire Protection. - Part 50: Domestic Licensing of Production and Utilization Facilities - *Code of Federal Regulations* - Title 10: Energy," and the ongoing FAQ process as documenting approaches, methods, and data acceptable to the staff for adopting a fire protection program consistent with NFPA 805.

The NRC staff identified several new methods that were used in the Fire PRA. RAIs were requested about these methods, and the responses have been reviewed. The staff noted that the justification provided for the methods listed below is not complete.

#### Methods:

- PRA RAI 01.c regarding fire zone boundaries
- PRA RAI 01.d regarding treatment of fire-induced instrument failure
- PRA RAI 01.g (as clarified by PRA RAI 01.g.01) regarding miscellaneous hydrogen fires
- PRA RAI 01.i regarding minimum joint HEPs
- PRA RAI 01.j regarding providing mean values reflecting propagation of parametric uncertainty, accounting for the state of knowledge correlation
- PRA RAI 01.l regarding incorporation of HEPs into the Fire PRA model

- PRA RAI 01.m regarding (i) treatment of dependencies between nonsuppression probabilities (NSPs) applied in the fire scenario analysis, (ii) detection system unreliability, and (iii) removal of NSP credit for HEAF and oil fire scenarios
- PRA RAI 01.o regarding treatment of credited human failure events and their feasibility
- PRA RAI 02 regarding limiting fire damage within a cabinet or panel monitored by an in-cabinet detection system
- PRA RAI 02.b.01 regarding MCB fire ignition frequency
- PRA RAI 03.a regarding treatment of well-sealed electrical cabinets that have robustly secured doors (and/or access panels) and that house only circuits below 440V
- PRA RAI 03.c (as clarified by PRA RAI 03.c.01) regarding fire propagation for cabinets housing circuit voltages of 440V or greater
- PRA RAI 05 (as clarified by PRA RAI 05.01) regarding transient influencing factors
- PRA RAI 06 regarding junction box fires
- PRA RAI 07 (as clarified by PRA RAI 07.01) regarding treatment of transient fires in manholes
- PRA RAIs 01.o and 15.c (as clarified by PRA RAI 15.01) regarding peer review of upgraded methods.
- PRA 17.b (as clarified by PRA 17.b.01) regarding assigning very low HEPs to some joint human actions.
- The following Fire Modeling RAI appears to have caused changes that may impact the fire-affected components for a variety of fires. The aggregate change-in-risk evaluation should include the potential impact of changes in:
  - FM RAIs 01.c, 01.d and 01.e regarding the MCR abandonment timing analysis and the heat release rate used in the damage accrual method.
  - FM RAIs 01.h, 01.i and 01.l regarding secondary combustibles and cable fires
  - FM RAI 01.m regarding noncable intervening combustibles
  - PRA RAI 01.n regarding wall and corner effects
  - FM RAI 01.p regarding HEAF scenarios
  - FM RAI 02.e regarding pre-heating of targets prior to the critical heat flux

The following methods have been identified, but the NRC staff review is continuing with additional RAIs and further supporting information has been requested.

Methods still under review:

- PRA RAI 02.b.02 regarding MCB fire scenarios for Unit 2
  - PRA RAI 12.01 regarding non-conservatism in delta risk associated with operator action dependencies
  - PRA RAI 11.c.01 regarding MCR abandonment risk for compliant plant
  - PRA RAI 11.c.02 regarding credit for MCR abandonment on loss of control
  - PRA RAI 20 regarding barrier failure probabilities in the MCA
- a. Provide the results of a composite analysis that shows the integrated impact on the fire risk (CDF, LERF,  $\Delta$ CDF,  $\Delta$ LERF) after replacing all the identified methods. As the review process is concluded, additional changes to replace any method or weakness still under review may be required. In this composite analysis, for those cases where the individual issues have a synergistic impact on the results, a simultaneous analysis must be performed. For those cases where no synergy exists, a one-at-a-time analysis may be done. If the impact on the change in risk from transition is negligible, a quantitative evaluation is unnecessary.
  - b. For each method (i.e., each bullet) above, explain how the issue will be addressed in (i) the final composite analysis results provided in support of the LAR and (ii) the PRA that will be used at the beginning of the self-approval of post-transition changes. In addition, provide a method to ensure that all changes will be made, that a focused-scope peer review will be performed on changes that are PRA upgrades as defined in the PRA standard, and that any findings will be resolved before self-approval of post-transition changes.
  - c. Explain how the RG 1.174 risk acceptance guidelines are satisfied for the composite analysis. Include consideration of PRA RAI 18, and if applicable, include a description of any new modifications or operator actions being credited to reduce risk (or delta risk) as well as a discussion of the associated impacts to the fire protection program.
  - d. If any of the identified methods will be retained in the PRA that will be used to estimate the change in risk of post-transition changes to support self-approval, explain how the quantitative results for each future change will account for the use of a particular method.

The first batch on or before September 12, 2014:

PRA RAI 04.c.01a and b  
 PRA RAI 15.01  
 PRA RAI 17.b.01  
 PRA RAI 18  
 PRA RAI 01.d.01  
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The second batch on or before October 10, 2014:

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 PRA RAI 11.c.02a, b, and c  
 PRA RAI 12.01  
 PRA RAI 19.a and b  
 PRA RAI 20  
 PRA RAI 21.a, b, c and d

If you have any questions, please contact me at (301) 415-1447.

Sincerely,

**/RA/**

Farideh E. Saba, Senior Project Manager  
 Plant Licensing Branch II-2  
 Division of Operating Reactor Licensing  
 Office of Nuclear Reactor Regulation

Enclosure:  
 Request for Additional Information

Docket Nos. 50-335 and 50-389

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