

**From:** [Ramsey, Kevin](#)  
**To:** [Downs, James](#); [ATSabisch@nuclearfuelservices.com](mailto:ATSabisch@nuclearfuelservices.com)  
**Subject:** Final Summary of Call w/NFS re: Revisions to Fire Safety Chapter  
**Date:** Wednesday, August 20, 2014 4:29:00 PM

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On August 20, 2014, the following individuals participated in a call to discuss proposed changes to Fire Safety Chapter in the NFS license application:

Andy Sabisch, NFS  
Andy Caldwell, NFS  
Tonya Cloyd, NFS  
Kevin Ramsey, NRC  
James Downs, NRC

NFS noted that the NFPA Code uses the term “exemptions,” but not the term “deviations” which NRC uses. NRC staff agreed that the terms were equivalent.

NFS described new language which was added to clearly state that NFS officials may approve “equivalent” fire safety controls, but exemptions/deviations from the NFPA code must be submitted to NRC for approval. NRC staff confirmed that the new words sounded good.

NFS asked about some fire safety issues which it has evaluated recently.

- In one case, the sprinkler water density was slightly below the pressure stated in the NFPA code. NFS determined that it had equivalent protection because, in addition to the sprinkler system, it had a robust smoke detector system. NRC staff agreed that multiple controls and early detection provided equivalent protection.
- In another case, NFS determined that a hazard classification for an area was inappropriate (too conservative) and it reclassified the area. NRC staff confirmed that NFS had the authority to make modifications to comply with the NFPA code. Applying a more appropriate classification would be considered complying with the code, not an equivalency or an exemption/deviation.
- In another case, NFS determined that storage height was slightly above the NFPA 13 allowance because of the pallet height. NFS determined that it had equivalent protection because, in addition to the sprinkler system, it had a robust smoke detector system. NRC staff agreed that multiple controls and early detection provided equivalent protection.

NFS stated that it would submit the revised Fire Safety Chapter for NRC approval.