

## NRC Comments on FPRA FAQ 14-0009, Revision D

The Bin 15 discussion in Chapter 6 of NUREG/CR-6850 states that “panels that house circuit voltages of 440V or greater are counted because an arcing fault could compromise panel integrity (an arcing fault could burn through the panel sides, but this should not be confused with the high energy arcing fault type fires).”

FAQ 08-0042, “Fire propagation from electrical cabinets,” states that “[t]he wording provided in Appendix G relative to the potential for fire spread beyond the boundaries of an unvented cabinet should be disregarded. The wording provided in Chapter 11 relative to fire propagation from electrical cabinets is the intended and correct guidance.” The FAQ concludes that “[t]his clarification should not require any reconsideration of the original fire ignition source counting results, provided the guidance in Chapter 6 was followed.”

FAQ 08-0042 was a narrow clarification on the status of two conflicting paragraphs in Chapter 11 and Appendix G of NUREG/CR-6850 and did not affect the balance of the guidance outside those two paragraphs. As supported by the list of arcing events in Appendix M, the guidance in NUREG/CR-6850 was to assume fires would get out of electrical cabinets that house circuit voltages of 440V or greater and, therefore, they should not be treated as well-sealed. FAQ 08-0042 did not change this guidance.

The NRC staff believes that FPRA FAQ 14-0009, “Treatment of Well-Sealed Electrical Panels Greater than 440V,” Revision D ([ML14188B126](#)) misinterprets FAQ 08-0042 and the intended guidance from NUREG/CR-6850 by suggesting that FAQ 08-0042 changed the guidance so that Chapter 6 would provide no guidance related to fire propagation and that “the guidance provided in Chapter 6 is to be used solely for the counting of ignition sources and the associated partitioning of fire frequency.” Consistent with the guidance provided in Chapter 6, cabinets with > 440 V circuitry should not be counted among those that can be considered well-sealed per the clarified guidance in FAQ 08-0042. And, as stated for > 440 V cabinets in Chapter 6 and unchanged by FAQ 08-0042, fire can propagate beyond the confines of these cabinets.