

FAQ Number 14-0070

FAQ Revision 0e

FAQ Title Use of Non-Fire Treated Wood

Plant: Duke-Energy

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Distribution: (NEI Internal Use)

805 TF ☒ FPWG ☐ RATF ☐ RIRWG ☐ BWROG ☐ PWROG

Purpose of FAQ:

FAQ provides clarification for the Control of Combustible Materials (specifically non-fire treated wood) as applied to Fundamental Fire Protection Program and Design Elements Transition Review (NFPA 805, Chapter 3).

Is this Interpretation of guidance? ☒ Yes / No

Proposed new guidance not in NEI 04-02? ☒ Yes / No

Details:

NEI 04-02 guidance needing interpretation (include section, paragraph, and line numbers as applicable):

NEI 04-02, Section 4.3.1, Fundamental Fire Protection Program and Design Elements Transition Review, and Appendix K, "NFPA 805 Chapter 3 Clarifications".

3.3.1.2* Control of Combustible Materials. Procedures for the control of general housekeeping practices and the control of transient combustibles shall be developed and implemented. These procedures shall include but not be limited to the following program elements:

(1)* Wood used within the power block shall be listed pressure-impregnated or coated with a listed fire-retardant application.

Exception: Cribbing timbers 6 in. by 6 in. (15.2 cm by 15.2 cm) or larger shall not be required to be fire-retardant treated.

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Circumstances requiring guidance interpretation or new guidance:

Clarification of applicability of NFPA 805 Chapter 3, Section 3.3.1.2(1), which states "Wood used within the power block shall be listed pressure-impregnated or coated with a listed fire-retardant application."

Detail contentious points if licensee and NRC have not reached consensus on the facts and circumstances:

None

Potentially relevant existing FAQ numbers:

None

Response Section:

Proposed resolution of FAQ and the basis for the proposal:

Section 3.3.1.2(1) of NFPA 805 makes the following statement:

3.3.1.2* Control of Combustible Materials. Procedures for the control of general housekeeping practices and the control of transient combustibles shall be developed and implemented. These procedures shall include but not be limited to the following program elements:

(1)* Wood used within the power block shall be listed pressure-impregnated or coated with a listed fire-retardant application.

Exception: Cribbing timbers 6 in. by 6 in. (15.2 cm by 15.2 cm) or larger shall not be required to be fire-retardant treated.

To ensure clarity of the intent of the language "Wood used within the Power Block shall be listed pressure-impregnated or coated with a listed fire-retardant application." expansion of the term "used within the power block" is needed. The statement should be expanded upon for cases when untreated wood (i.e., shipping and packing materials) is necessary for routine plant operations and maintenance and when administratively controlled. This would further clarify the lack of a direct tie to section 3.3.1.2(3) and (4) for wood products. Included would be allowance for small quantities of non-treated wood used in commercially finished products such as hand tools and furnishings, containing inconsequentially small wood components (i.e., tool handles, picture frames), that do not adversely impact fire risk or consequences.

If appropriate, provide proposed rewording of guidance for inclusion in the next Revision:

Modify Appendix K to add the following clarification:

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K.X NFPA 805 Section 3.3.1.2(1) (FAQ 14-XXXX)

Specific clarification for NFPA 805 section 3.3.1.2(1), from FAQ 14-0070;

To comply with the term “Wood used within the power block shall be listed pressure-impregnated or coated with a listed fire-retardant application.” where used in section 3.3.1.2(1), one acceptable method is as follows:

Use of wood inside the Power Block may be permitted when suitable noncombustible substitutes are not available. All wood smaller than 152 millimeters (mm)×152 mm (6 inch (in.)×6 in.) (nominal) used in power block during maintenance, modification, or refueling operations (such as ramps, lay-down blocks or scaffolding) shall be treated with a fire-retardant application. Non-fire retardant treated wood may be allowed in the Power Block when a fire retardant alternative is not readily available, and appropriate administrative controls are in place (transient permits, firewatches, etc.). Examples include equipment or supplies shipped in untreated combustible packing containers, wood pallets, cable spools, truck/trailer bed floors, etc.

In addition, the use of commercially available products (e.g., tools, janitorial supplies, special fixtures, and office type furnishings) which contain small quantities of untreated wood as an integral part of a finished product would be allowed. These finished product items would not be subject to additional fire prevention administrative controls.

In addition, storage or staging areas that comply with section 3.3.1.2(4) may be designated to allow storage of untreated wood, provided that the designated area is sufficiently separated from equipment, cables, and components required to support nuclear safety performance criteria (i.e., maintained free of fire damage). The determination of “sufficiently separated” shall be made by a qualified fire protection engineer.