

May 14, 2015

MEMORANDUM TO: Alexander R. Klein, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Barry W. Miller, Sr. Project Manager /RA/
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 7, 2015, CATEGORY 2 MEETING BETWEEN
THE NUCLEAR REGULATORY COMMISSION AND NUCLEAR
ENERGY INSTITUTE REGARDING NATIONAL FIRE PROTECTION
ASSOCIATION STANDARD 805

On May 7, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference meeting with the Nuclear Energy Institute (NEI) and the public to discuss issues related to license amendment reviews and implementation of National Fire Protection Association Standard 805 (NFPA 805). The meeting notice was made available at Agencywide Document Access and Management System (ADAMS) Accession No. ML15117A127.

For the first topic of the meeting, the NRC provided a status of its review of License Amendment Requests (LARs) submitted by licensees to transition to NFPA 805. The NRC indicated that one license amendment was expected to be issued within about a week, and three more around the end of July.

Next, the NRC staff provided a summary of recent public meetings it held with some licensees related to main control room abandonment analyses. NRC staff indicated that the public meetings were productive and that it expected to be able to successfully complete its safety evaluation regarding this issue for the plants affected. NEI asked if the NRC was addressing this issue on a more generic basis, and the NRC staff indicated that it planned to continue to address this technical issue on a LAR-specific basis, as necessary. The NRC staff next gave some feedback to NEI staff that it continues to see some LAR changes being requested by licensees at very late stages in the review, and that these changes impact the NRC staff's ability to complete the reviews on time.

The NRC staff then broached the topic of draft NRC guidance on heat release rates from electrical enclosures. Specifically, the NRC staff indicated that the guidance was currently available for public comment until June 15, 2015. The NRC cautioned that licensees should not

CONTACT: Barry W. Miller, NRR/DRA
(301) 415-4117

use the draft guidance because the evaluation and disposition of public comments could impact the NFPA 805 LAR reviews and schedules. Furthermore, NRC staff indicated that while the final guidance document will be issued by the NRC's Office of Nuclear Regulatory Research (RES), the appropriate approval to begin using new heat release rates for NFPA 805 licensing applications should come from correspondence by the NRC's Office of Nuclear Reactor Regulation.

The discussion then moved on to the topic of potential approaches for approving changes to required modifications during the post-amendment implementation period. The NRC staff gave a brief summary of the April 13, 2015, public meeting that addressed this topic. NEI staff then indicated that, based on what it learned from the April 13 meeting, it was developing a modified proposal that would request a change to the license condition to allow licensee self-approval of modification changes, but that it would include a notification to the NRC ahead of the implementation of the change to allow for NRC review. NEI indicated that it would have the details of the proposal in writing and sent to the NRC by the following week. Both NRC and NEI staff resolved to hold a separate public meeting to discuss this proposal in depth within several weeks.

Next, NRC staff provided an update regarding fire research items. NRC staff indicated that a draft NUREG on very early warning fire detection systems would be published for comment within the next few months. An overview was provided on the status of the international high energy arcing fault testing project, and a notice was given about the upcoming Fire PRA training co-sponsored by RES and the Electric Power Research Institute (EPRI).

An opportunity for public comment was provided near the end of the meeting. No public comments were received. The meeting was then adjourned.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:

As stated

use the draft guidance because the evaluation and disposition of public comments could impact the NFPA 805 LAR reviews and schedules. Furthermore, NRC staff indicated that while the final guidance document will be issued by the NRC's Office of Nuclear Regulatory Research (RES), the appropriate approval to begin using new heat release rates for NFPA 805 licensing applications should come from correspondence by the NRC's Office of Nuclear Reactor Regulation.

The discussion then moved on to the topic of potential approaches for approving changes to required modifications during the post-amendment implementation period. The NRC staff gave a brief summary of the April 13, 2015, public meeting that addressed this topic. NEI staff then indicated that, based on what it learned from the April 13 meeting, it was developing a modified proposal that would request a change to the license condition to allow licensee self-approval of modification changes, but that it would include a notification to the NRC ahead of the implementation of the change to allow for NRC review. NEI indicated that it would have the details of the proposal in writing and sent to the NRC by the following week. Both NRC and NEI staff resolved to hold a separate public meeting to discuss this proposal in depth within several weeks.

Next, NRC staff provided an update regarding fire research items. NRC staff indicated that a draft NUREG on very early warning fire detection systems would be published for comment within the next few months. An overview was provided on the status of the international high energy arcing fault testing project, and a notice was given about the upcoming Fire PRA training co-sponsored by RES and the Electric Power Research Institute (EPRI).

An opportunity for public comment was provided near the end of the meeting. No public comments were received. The meeting was then adjourned.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

DISTRIBUTION:

DRA R/F	AKlein	BMiller
CMoulton	DFrumkin	SRosenberg

ADAMS Accession No.: ML15131A396

Office	NRR/DRA/AFP	NRR/DRA/AFP	NRR/DRA/APLA
Name	BMiller	AKlein	SRosenberg
Date	05/ 11 / 15	05 / 14 / 15	05 / 12 / 15

OFFICIAL RECORD COPY

**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
NRC/NEI MANAGEMENT MEETING
LIST OF ATTENDEES**

May 7, 2015

**U. S. Nuclear Regulatory
Commission Staff**

J. Giitter
S. Lee
R. Correia
A. Klein
S. Rosenberg
M. Salley
B. Miller
J. Robinson
D. Frumkin
C. Moulton
S. Dinsmore

Stakeholders

E. Flick (Exelon)
V. Anderson (NEI)
J. Ertman (Duke)
A. Lindeman (EPRI)
F. DePeralta (PNNL)
A. Jelalian (EPM)
T. Dodson (EPM)
L. Abbott (FPL)
J. Stone (TVA)
P. Barbadoro (FireSmart)
T. Basso (Exelon)
M. Schairer (EPM)
A. Ratchford (RDS)

ENCLOSURE