

June 1, 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 27, 2015, CATEGORY 2 PUBLIC MEETING
REGARDING THE NATIONAL FIRE PROTECTION ASSOCIATION
STANDARD 805 FREQUENTLY ASKED QUESTIONS PROCESS

On May 27, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference with stakeholders and the public to discuss Frequently Asked Questions (FAQs) at plants that are adopting National Fire Protection Association Standard 805 (NFPA 805). The meeting notice was made available at Agencywide Document Access and Management System (ADAMS) Accession No. ML15146A448.

Industry stakeholders and the NRC staff discussed two currently open FAQs:

1. FAQ 14-0070, Revision 0e (dated March 11, 2015), deals with the use of non-fire treated wood in the power block. This revision addressed NRC comments provided during the last FAQ meeting on December 16, 2014. The NRC staff provided additional comments at this meeting (found at ADAMS Accession No. ML15146A167) that the FAQ should better explain the basis for the FAQ. Based on these comments, the industry sponsors of the FAQ indicated that the FAQ would be revised and resubmitted for NRC review.
2. FAQ 14-0071, Revision 0a (dated April 13, 2015), deals with acceptable uses for cables that are not qualified to IEEE Standard 383. This revision addressed NRC comments provided during the last FAQ meeting on December 16, 2014. The NRC staff provided additional comments at this meeting (found at ADAMS Accession No. ML15146A208) that the FAQ is written specific to cables for crane applications and that the industry should consider whether any other applications might apply to cables that require special properties; this could potentially preclude another FAQ in the future. The NRC staff noted that the first comment in ML15146A208 does not accurately characterize the FAQ concerns and therefore did not need a response. The industry sponsors of the FAQ indicated that they would go back and consider whether the scope should be expanded.

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Industry representatives also introduced one new FAQ. FAQ 15-0075, Revision 0 (ADAMS Accession No. ML15146A249), seeks to change the NFPA 805 transition license condition to allow licensees to make changes to the modifications described in Attachment S of an NFPA 805 amendment request while providing the NRC an advance notification of the change. The industry provided an overview of the new FAQ and the NRC staff indicated that they would need to review the proposal in more detail and would likely then schedule a stand-alone meeting on this topic to provide feedback.

The industry also introduced a topic related to subject matter in Chapter 3 of the NFPA 805 Standard. Because several recent FAQs have addressed specific Chapter 3 issues, the industry proposed that going through the rulemaking process to revise 10 CFR 50.48(c)(2)(vii) might be the best approach to more generically resolve Chapter 3 issues rather than going through the FAQ process each time. The industry provided a table that catalogues Chapter 3 sections and which licensees had included Attachment L requests in their license amendment requests. The NRC staff asked the industry to provide a more specific rulemaking proposal that it could evaluate. The NRC staff also indicated that, process-wise, it would get staff from its rulemaking group involved going forward.

Lastly, the NRC staff asked the industry for a status on the revision of FAQ 14-0073 regarding fuel-fired equipment which the NRC had also provided comments on during the meeting on December 16, 2014. Industry staff indicated that the author of the FAQ had been busy with other work but expected to provide the NRC the new revision soon.

An opportunity for public comment was provided at the end of the meeting. No members of the public attended and therefore no comments were received.

In summary, the actions resulting from this meeting were: for the industry to consider the NRC's comments on FAQ 14-0070 and FAQ 14-0071 and make revisions as necessary; for the NRC to review new FAQ 15-0075 in more detail and then set up a stand-alone public meeting to discuss with industry; for the industry to provide a more specific rulemaking proposal regarding NFPA 805 Chapter 3; and for the industry to provide an updated revision of FAQ 14-0073.

All meeting materials can be found in ADAMS at the following Accession numbers:

- FAQ 14-0070, Revision 0e, is available at ML15126A260
- FAQ 14-0071, Revision 0a, is available at ML15126A268
- NRC staff comments on FAQ 14-0070, Revision 0e, are available at ML15146A167
- NRC staff comments on FAQ 14-0071, Revision 0a, are available at ML15146A208
- FAQ 15-0075, Revision 0, is available at ML15146A249
- NFPA 805 Chapter 3 Catalogue is available at ML15146A251

Additionally, the latest NRC NFPA 805 FAQ Status and History document is available at ADAMS Accession No. ML15148A691.

A list of meeting attendees is enclosed with this memorandum.

Enclosure:
As stated

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As stated

DISTRIBUTION:

DRA R/F AKlein BMiller CMoulton DFrumkin

ADAMS Accession No.: ML15148A686

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Name	BMiller	AKlein
Date	05/28/15	06/01/15

Official Record Copy

**NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
FREQUENTLY ASKED QUESTIONS PROCESS MEETING
LIST OF ATTENDEES**

May 27, 2015

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

B. Miller
C. Moulton
D. Frumkin
S. Dinsmore
A. Klein

Stakeholders

V. Anderson (NEI)
M. Schairer (EPM)
R. Kalantari (EPM)
S. Weimer (Enercon)
J. Ertman (Duke Energy)
F. Pellizzari (EPM)
A. Ratchford (RDS)
T. Dodson (EPM)
D. Davidson (Southern Nuclear)
P. Bemis (PG&E)
P. Phan (Appendix R Solutions)
J. Quinn (EPM)
M. Crompton (EPM)
B. Simril (TVA)
J. Branum (Southern Nuclear)
T. Jutras (EPM)
L. Kreider (EPM)
J. Ross (First Energy)
T. Shudak (NPPD)
R. Regan (FPL)
F. DePeralta (PNNL)
S. Short (PNNL)