

FAQ Number 14-0070 FAQ Revision 0f

FAQ Title Use of Non-Fire Treated Wood

Plant: Duke-Energy Date: July 21, 2015

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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.

Specific clarification is provided such that for NFPA 805 Chapter 3, NFPA 805 - Section 3.3.1.2(1) does not apply to, that is does not prohibit, the use of non-fire treated wood when an approved program exists for the control of the wood. For example, Section 3.3.1.2(3) would apply to non-fire treated waste, debris, scrap, and packing materials.

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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 14-0070)

Specific clarification for NFPA 805 Chapter 3, NFPA 805 - Section 3.3.1.2(1) does not apply to, that is does not prohibit, the use of non-fire treated wood when an approved program exists for the control of the wood. For example, Section 3.3.1.2(3) would apply to non-fire treated waste, debris, scrap, and packing materials. Added clarifying guidance for some but not all types of non-treated wood is listed as follows, 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.) x 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/cargo container 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. These type non-treated wood items and others as may be identified would apply when other materials of a non-combustible material are not feasible or readily available for use or would pose greater fire hazard than the wood item.

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.

The aforementioned examples and guidance would be included in the site's procedural guidance for administrative control and limitations for transient combustibles.