

**Fire PRA F&O  
Record of Review  
Dispositions to Ginna Fire PRA Facts and Observations (F&Os)**

FINDING/ SUGGESTION (F&O) ID OR SUPPORTING REQUIREMENT (SR)	ACCEPTABLE TO STAFF VIA		
	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
<b>Table V-1</b>			
CS-A1-01		This F&O is related to current transformers with turn ratio greater than 1200:5 involving a fire-induced secondary open circuit that could cause a secondary fire. This phenomenon was considered in NUREG-7150, and the PIRT panel judged the likelihood of secondary fires from higher ratio CTs to be very low. In the absence of test data along with the concern becoming more pronounced as turns-ratio increases, the panel concluded that the failure mode could not be classified as incredible. The response to RAI 25.a (ADAMS Accession No. ML14038A109) recognized the NUREG-7150 study; however, concluded that a sensitivity analysis could not be performed given the currently available studies. The NRC staff concludes this study provides the most currently available results so that this issue can be treated qualitatively as very low pending further research.	
CS-B1-01	A		
FQ-E1-01	A		
FQ-F1-02		The licensee responded to PRA RAI 25.b (ADAMS Accession No. ML14038A109) and will consider significant accident sequences to be in the 95 <sup>th</sup> percentile for CDF and LERF. Use of the 95 <sup>th</sup> percentile is consistent with the RG 1.200 definition of a significant sequence. In response to PRA RAI 44.01.b (ADAMS Accession No. ML15167A506), the licensee noted that	

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		documentation had been updated reflecting contributors in the 95 <sup>th</sup> percentile. Based on these RAI responses the NRC staff finds this F&O is adequately addressed.	
FQ-F1-03	A		
FSS-A3-01	B		
FSS-A4-01	B		
FSS-A6-01		N/A	Discussed in Section 3.4.2.3 (FM RAI 01(3).e)
FSS-C1-01		The NRC staff finds the method described in the response to PRA RAI 25.c (ADAMS Accession No. ML14038A109) is acceptable as the licensee indicates that both the critical HRR and the HRR demonstrating low likelihood, high consequence conditions are postulated.	
FSS-D1-01		F&O FSS-D1-01 is related to Fire PRA software verification and validation. In response to PRA RAI 25.d (ADAMS Accession No. ML14038A109) the licensee explained that the Ginna fire modeling database was subjected to an independent verification and validation (V&V) process. The scope of the V&V included fire ignition frequencies and data manipulation associated with preparation for quantification. The RAI response stated that the independent V&V results concluded that the database is processing the data and information scenario input correctly. Therefore, the NRC staff finds this F&O is adequately addressed.	
FSS-D7-01		The F&O noted that unavailability had not been performed for the plant specific situation. In	

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		response to PRA RAI 25.e (ADAMS Accession No. ML14038A109), the licensee explained that plant specific unavailability was evaluated and also that no outlier behavior was identified for the credited systems. Therefore, the NRC staff finds this F&O is adequately addressed.	
FSS-F1-01	B		
FSS-G5-01	A		
HRA-C1-01	A		
HRA-E1-03	A		
IGN-B2-01		The NRC staff requested clarification in PRA RAI 25.g (ADAMS Accession No. ML14038A109) on the guidance used in addressing the ignition frequency bins noted in the F&O. The response noted the guidance used, which was acceptable NRC guidance, and therefore this F&O is adequately addressed.	
QNS-C1-01		The NRC staff requested clarification in PRA RAI 25.h (ADAMS Accession No. ML14038A109) on the screening of CDF and LERF with respect to Regulatory Guide 1.200, Revision 2 for QNS-C1-01. The response noted that no fire scenarios were removed from consideration using the QNS-C1-01 screening criteria. The NRC staff finds this F&O is adequately addressed since no scenarios were removed.	
SF-A1-01		The focus of supporting requirement SF-A1 is on initiating events, identifying unique fire ignition source scenarios may be important. In response to PRA RAI 25.i (ADAMS Accession No.	

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		ML14038A109), the licensee explained that it was not necessary to perform a walkdown of some fire areas for supporting requirement SF-A1 since the Fire PRA had assumed full compartment burnout, or no unique seismic-fire sources exist in these areas inside containment and all ignition sources are captured in the Fire PRA. For the control room the licensee explained that examination of ignition sources and estimate of CR fire frequency ensures that all potential ignition sources are captured, even those that might result from a seismic event. For the cable tunnel, the licensee concluded that no unique seismic-fire sources exist in the tunnel. Therefore, the NRC staff finds this F&O is adequately addressed.	
SF-A2-01		The F&O notes that the licensee did not fully assess the potential on the post-earthquake plant responses. In response to PRA RAI 25.j (ADAMS Accession No. ML14038A109), the licensee described the reviews and assessments performed, and concluded that there are no deviations from the installation standards which might adversely impact safe shutdown. In addition, current fire emergency procedures are adequate to respond to spurious operation of alarms and/or suppression systems, loss of suppression systems, or diversion of suppressants from areas where they might be needed. Based on the response to the RAI the	

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		NRC staff concludes this F&O is adequately addressed.	
<b>Table V-2</b>			
CS-B1	A		
FSS-G5	A		
FQ-F1		See discussion for FQ-F1-02.	
FQ-F2	A		

A: The NRC staff finds that the disposition of the F&O as described by the licensee in the LAR provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application.

B: The NRC staff finds that the disposition of the F&O as described by the licensee in the LAR and further clarified during the audit provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application.

C: The NRC staff finds that the resolution of the F&O, as described by the licensee in the LAR, would have a negligible effect on the evaluations relied upon to support fire risk evaluations and has no impact on the conclusions of the risk assessment and therefore the resolution of the F&O is acceptable for this application. Examples of such F&Os may be suggestions, as well as those F&Os that don't affect the fire PRA. Documentation issues may fall into this category as well.