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Cc: [Casto, Greg](#); [Barrett, Harold](#)
Subject: Question about FAQ 10-59, use of MRule for Monitoring
Date: Wednesday, November 02, 2016 10:15:00 AM

Victoria,

Below is a question about FAQ 10-59, to help focus the discussion during next week's FAQ meeting discussion on this FAQ.

The NRC staff has reviewed Revision 6 of FAQ 10-59, "NFPA 805 Monitoring," and still needs additional information to support moving this FAQ forward. The last FAQ meeting summary from August 22, 2016 (ML16229A236), suggested that the path forward would include, "[H]aving the FAQ describe how maintenance rule distributions – and mean values – will ensure that assumptions in the fire PRA remain valid." This ties to the second sentence of NFPA 805, Section 2.6.

For example, what is the technical justification that the maintenance rule thresholds will be sufficient to ensure that the fire PRA remains valid? If equipment reliability drops without tripping the maintenance rule thresholds, why should the staff have confidence that the fire PRA remains valid? A component of this explanation would be an explanation, using values from a plant's maintenance rule and fire PRA analysis, demonstrating how this would work.

Dan

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