



NUCLEAR ENERGY INSTITUTE

Alexander Marion
DIRECTOR, PROGRAMS
NUCLEAR GENERATION

October 15, 1996

Mr. Charles E. Rossi
Director, Safety Programs Division
Office for Analysis and Evaluation of Operational Data
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Rossi:

NEI appreciates the opportunity to review AEOD's draft Special Study on Fire Events - Feedback of Operating Experience. The insights provided through this compilation and evaluation of operating data should prove valuable to the regulatory improvement efforts underway in the area of fire protection. EPRI is appropriately providing detailed technical comments on this draft report on behalf of industry. Our comments are brief and general in nature.

Data compilation and evaluation should be a cornerstone of an improved "performance-based" fire protection regulation. This report provides an opportunity for NRC to address a number of issues with respect to data inclusion and validity that will ultimately be encountered in developing an improved regulation. We believe it is important for NRC to come to internal agreement with respect to the inclusion and treatment of data within this report, and with its conclusions. Further, the positions taken by NRC in this regard should be consistent and should remain stable throughout the development of the improved regulation. The final report should provide a clear definition of what is and is not considered a fire event for the purposes of this evaluation. Further, we believe the scope of data being evaluated should continue to be limited to domestic nuclear plants in the final report, as design and regulatory differences preclude valid inclusion of data from fire events at international facilities or at other industrial facilities.

NEI believes the insights gained relative to fire risk, when reflected in the final report, should be factored into the ongoing rulemaking activities and the regulatory analyses.

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per C. Rossi

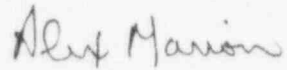
Mr. Charles E. Rossi

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Please contact Biff Bradley (202-739-8083) or me (202-739-8080) if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Alex Marion".

Alex Marion

AM/REB/ead