

**Response to Public Comments on Draft Regulatory Guide DG-1360
“Risk-Informed, Performance-Based Fire Protection for
Existing Light-Water Nuclear Power Plants”
Proposed Revision 2 of Regulatory Guide (RG) 1.205**

On December 16, 2020, the NRC published a notice in the *Federal Register* (85 FR 73088) that Draft Regulatory Guide, DG-1360 (Proposed Revision 2 of RG 1.205), was available for public comment. The Public Comment period ended on December 31, 2020. The NRC received comments from the organizations listed below. The NRC has combined the comments and NRC staff responses in the following table.

Comments were received from the following:

Victoria K. Anderson
Technical Advisor, Engineering & Risk
Nuclear Energy Institute (NEI)
1201 F Street NW, Suite 1100
Washington DC 20004
Agencywide Document and Management System
(ADAMS) Accession No. ML21007A329

Seth Statler
Director of Government Affairs
National Fire Protection Association (NFPA)
50 F Street NW
Suite 625
Washington, DC, 20740
ADAMS Accession No. ML21007A331

Commenter	Section of DG-1360	Specific Comment	NRC Resolution
Nuclear Energy Institute	Section 3, Pages 22-24	<p>Section 3.3 – Fire PRAs utilize processes in NUREG/CR-7150, Volume 2 on hot short induced spurious operation probability and duration.</p> <p><u>Proposed resolution:</u></p> <p>In order to acknowledge this and provide clarification in the event of any conflicts with Section 3.3, the following statement is recommended in Section 3.3 (following the paragraph in page 4 on shorting switches):</p> <p>“Guidance for circuit failure mode likelihood and hot short duration for use in Fire PRAs is included in NUREG/CR-7150, Volume 2.”</p>	The NRC staff agrees with this comment and made the suggested change to DG-1360.
Nuclear Energy Institute	Section 3.1, Page 19	<p>The following statement that is included in most, if not all, license conditions, is not included in Section 3.1.</p> <p>“This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.”</p> <p><u>Proposed resolution:</u></p> <p>Recommend including that statement at the end of “(1) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program.”</p>	The NRC staff agrees with this comment and made the suggested change to DG-1360.

Commenter	Section of DG-1360	Specific Comment	NRC Resolution
National Fire Protection Association	Section 2.2.3	NFPA supports the NRC in providing guidance to licensee's efforts in gaining approval for alternative methods prescribed by NFPA 805 but recommends that the NRC revise the language of DG-1360, 2.2.3 to include reference to NFPA 805, 1.7. This will not only clarify the alignment between DG-1360 with NFPA 805 but also reinforce the incorporation of NFPA 805 into 10 CFR 50.48.	<p>The NRC staff agrees with this comment.</p> <p>The NRC staff revised DG-1360 to add the following sentence at the end of Section 2.2.3:</p> <p>“Licensee self-approval of fundamental FPP changes in NFPA 805 Chapter 3 may be granted in the fire protection license condition if the alternative is functionally equivalent or adequate for the hazard as appropriate. This license condition does not apply to changes made under NFPA 805, Section 1.7, “Equivalency” because NFPA 805, Section 1.7 requires that those changes be submitted to and approved by the NRC.”</p>
National Fire Protection Association	N/A	Additionally, NFPA recommends that the NRC consider making future revisions to 10 CFR 50.48(c)(4) to reduce the redundant language with NFPA 805.	The NRC staff notes this comment. However, the actions suggested by the comment would require rulemaking, which is beyond the scope of this regulatory guide.
National Fire Protection Association	N/A	We recommend that efforts should focus on more closely aligning 10 CFR 50.48(c)(4) with NFPA 805 and more on what licensees must include in the technical documentation already required by NFPA 805, 1.7 versus providing Special Exemptions under 10 CFR 50.12.	The NRC staff notes this comment. However, the actions suggested by the comment would require rulemaking, which is beyond the scope of this regulatory guide.

Commenter	Section of DG-1360	Specific Comment	NRC Resolution
National Fire Protection Association	N/A	The 2020 edition of NFPA 805 is the most advanced performance-based standard for fire protection within the industry and we strongly encourage its adoption into 10 CFR 50.48.	The NRC staff notes this comment. However, the actions suggested by the comment would require rulemaking, which is beyond the scope of this regulatory guide.