

Industry Comments on Draft Regulatory Guide 1.205 (ML092450118)

September 10, 2009

Improvements

- Technical Adequacy of Fire PRA
 - Base Model: Self Assessment and Peer Review Process of RG 1.200
 - Cause & Effect: Will address via FAQ process
- Engineering Equivalency Evaluations
 - FAQ 06-008 closure
- Recovery Actions
 - Primary Control Station Definition
 - Limiting additional risk evaluation to “actions to demonstrate the availability of a success path for the nuclear safety performance criteria”

Regulatory Stability

- Regulatory Guide should reference NEI 04-02 and the extent of endorsement
- Regulatory Guide should not be issued until pilot process is fully vetted and LAR template has been established
- Regulatory Guide should be issued with a final version of NEI 04-02

Specific Comments

- Recovery Actions
- License Condition
- Fire Risk Evaluation versus Change Evaluation
- Post-Transition Change Evaluation Process

Recovery Actions

- No explicit requirement in § 4.2.4 to address the additional risk presented by the use of RAs using § 4.2.4.1 or 4.2.4.2
 - Plants employing § 4.2.4.1 have no requirement to perform a “risk calculation” for RAs
 - Therefore, the treatment of the risk of RAs should be allowed outside of the “fire risk evaluation” outlined in NFPA 805 § 4.2.4.2
 - The Pilot LAR submittals provide one acceptable method of evaluating additional risk

Recovery Actions

- Pilot Plant LAR Treatment
 - VFDRs related to Recovery Actions were specifically evaluated in the change process
 - All other Recovery Actions (allowed / approved) were evaluated as follows
 - Detailed assessment of risk was bounded by the base Fire PRA
 - Reviewed for adverse risk impact

License Condition

- 10 CFR 50.48 (c)(3)(ii) does not require the completion of modifications prior to implementing the NFPA 805 Fire Protection Program
- Proposed License Condition restricts plant changes to 'no risk increase' until modifications are complete

Fire Risk Evaluation versus Change Evaluation

- Terms are used interchangeably in Regulatory Guide
- The apparent restriction on the use of Change Evaluations to post-transition is inconsistent with Pilot Plant LARs and Revision 0 of Regulatory Guide

Post-Transition Change Evaluation Process

- Regulatory Guide is focused solely on the ‘detailed risk evaluation’ portion of the NEI 04-02 Change Process
 - Many fire protection program plant changes will not require the ‘detailed risk evaluation’
- Regulatory Guide 1.200 documentation requirements for change evaluations is not appropriate for routine plant changes

Related Issues

- SER Template
- Time for non-pilots to implement Regulatory Guide changes
- Inspection Process