

**RISK-INFORMED,
PERFORMANCE-BASED FIRE
PROTECTION FOR EXISTING
LIGHT-WATER NUCLEAR
POWER PLANTS**

Final Draft for ACRS: RG 1.205, Revision 1

*Category 3 Public Meeting
October 29, 2009*

Agenda

- Meeting Purpose
- Outcome of September 10, 2009 Public Meeting
 - Changes in Revision 1 of RG 1.205
 - Issues Raised by Industry
- General Discussion

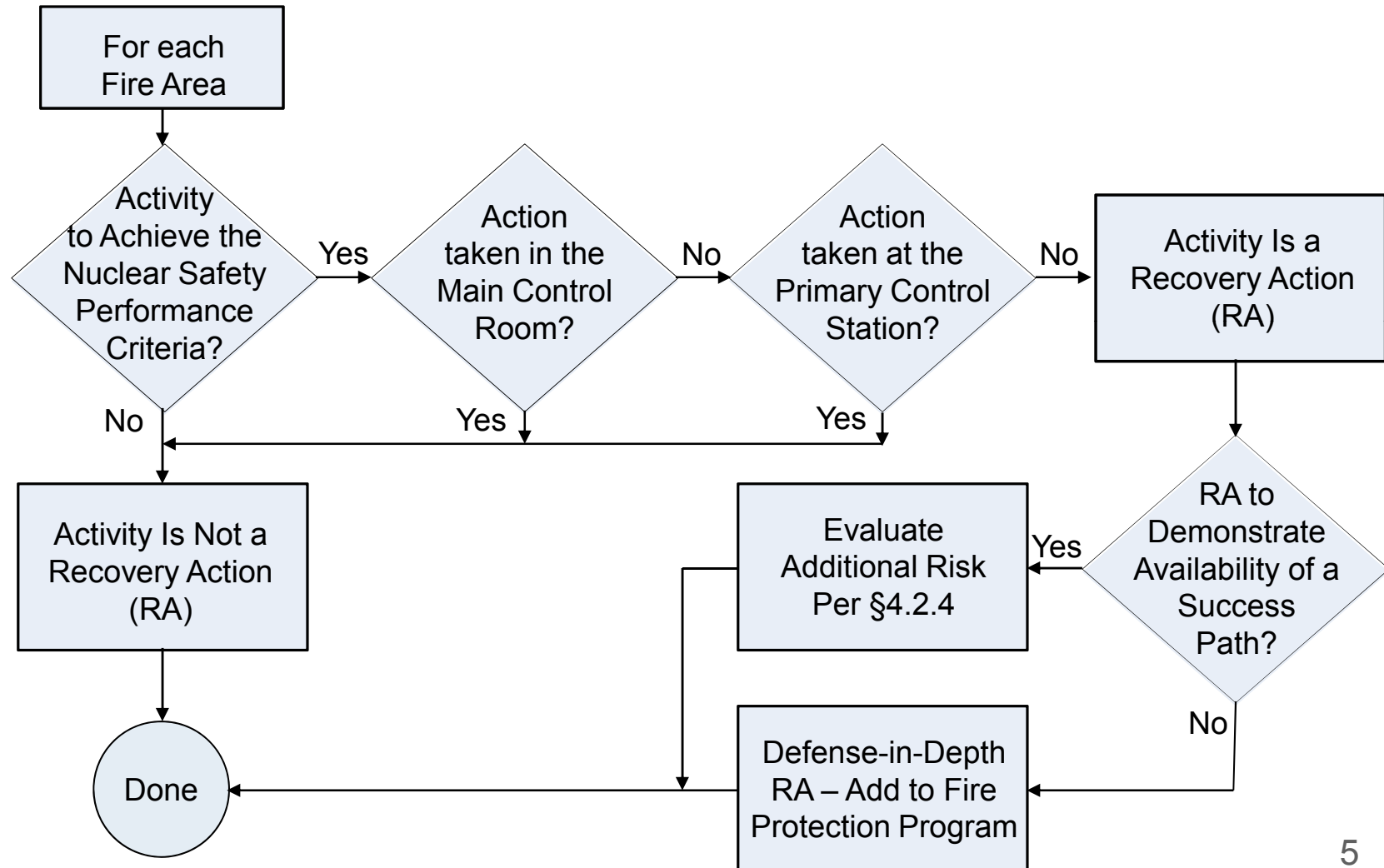
Meeting Purpose

- This meeting is to inform stakeholders of the changes to RG 1.205, Revision 1, since the September public meeting
- Public participation is actively sought
 - Questions may be asked throughout the meeting



CHANGES

Recovery Actions in NFPA 805



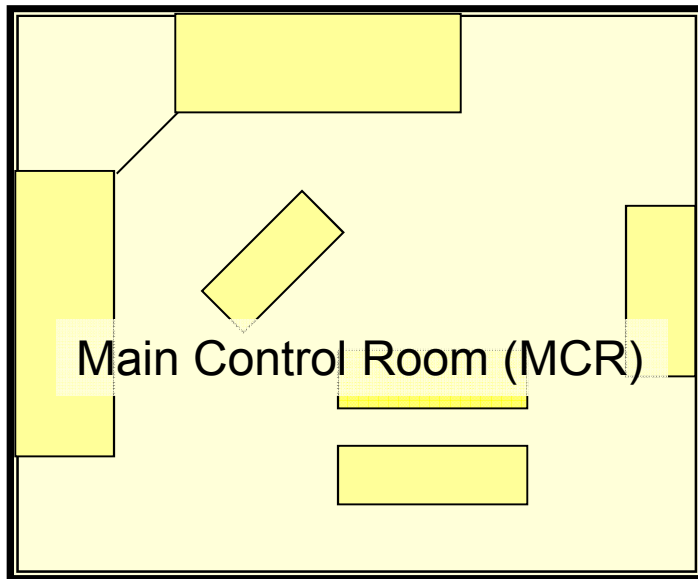
Recovery Actions

- Risk of previously-approved recovery actions – same as presented at 9/10/09 public meeting
- Re-baseline for tracking cumulative risk post-transition (same)
- Improved definition of PCS to address “hybrid” issue raised at the 9/10/09 meeting (next slide)

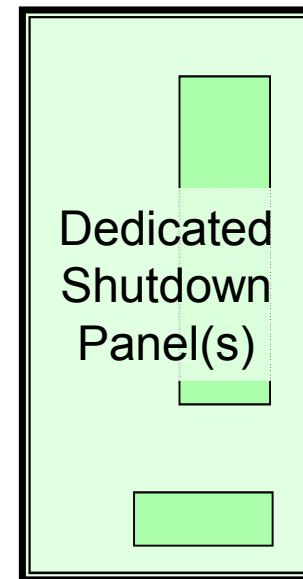
Clarified Definition of Primary Control Station

- Stakeholders pointed out that the definition in the September, 2009, version was ambiguous
- Revised definition to include shifting of command and control from the main control room to the primary control station(s)*
- Revised text and the figure

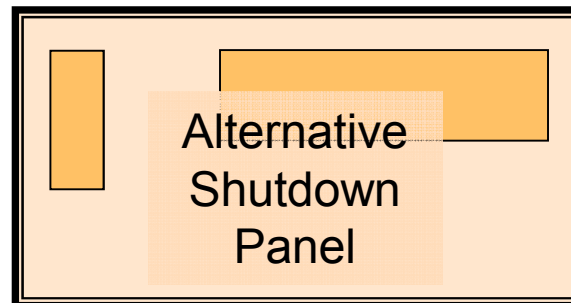
* Plural in the case of approved dedicated shutdown panels



Control Room actions are not recovery actions



Dedicated Shutdown Panel actions are not recovery actions*



Alternative Shutdown actions are not recovery actions* provided:

- Primary command & control
- Requisite controls, indications, & communications
- Multiple components controlled from location

* When command and control is shifted from the MCR

Enhanced the Sample License Condition

- Allow non-risk informed changes to the fire protection program that have no more than a minimal risk impact
 - Consistent with intent of NEI 04-02
 - Allow screening per process approved in plant-specific NRC safety evaluation report
- Moved information regarding *functional equivalency* and *adequate for the hazard* (FAQ-06-0008) from §3.2.4 to the sample license condition.

**ISSUES RAISED BY
INDUSTRY ON 9/10/09**

Industry Raised Specific Comments

- Recovery Actions (*already discussed*)
- License Condition (*already discussed*)
- Fire Risk Evaluation versus Change Evaluation
- Post-Transition Change Evaluation Process
- Regulatory Stability

Fire Risk Evaluation versus Change Evaluation

- RG 1.205, Rev. 1 clarifies use of fire risk evaluation as one of the performance-based methods in NFPA 805
- The regulatory guide keeps the terms “fire risk evaluation” and “plant change evaluation” separate

Post-Transition Change Evaluation Process

- RG 1.205, Rev. 1 adds the ability to screen fire protection plant changes, consistent with the NEI 04-02 Change Process
- This applies both during transition and after implementation of NFPA 805

Regulatory Stability

- In April of 2008, NEI asked NRC to endorse NEI 04-02, Rev. 2
 - Captures some significant FAQs
 - Further changes planned for subsequent revision
- Significant lessons from the NFPA 805 pilot plants are captured in RG 1.205, Rev. 1
 - Missing guidance has been provided
 - Potential ambiguities have been minimized
- Future revisions of NEI 04-02 and RG 1.205 should be fine-tuning as additional experience is gained
- Issuance of RG 1.205, Rev. 1 at this time fosters regulatory stability

Conclusion

- Stakeholder comments were fully considered in developing RG 1.205 Rev. 1
 - A number of difficult issues have been resolved
 - Missing guidance has been provided
 - Potential ambiguities have been minimized
- NRC staff will request ACRS endorsement
 - Subcommittee 11/13/09
 - Full committee in December, 2009
- Anticipate publishing RG 1.205, Rev. 1 by February, 2010
 - Goal is to foster full and scrutable compliance
 - NRC staff seeks to publish guidance that clearly shows how compliance could be achieved without creating unnecessary burden to licensees

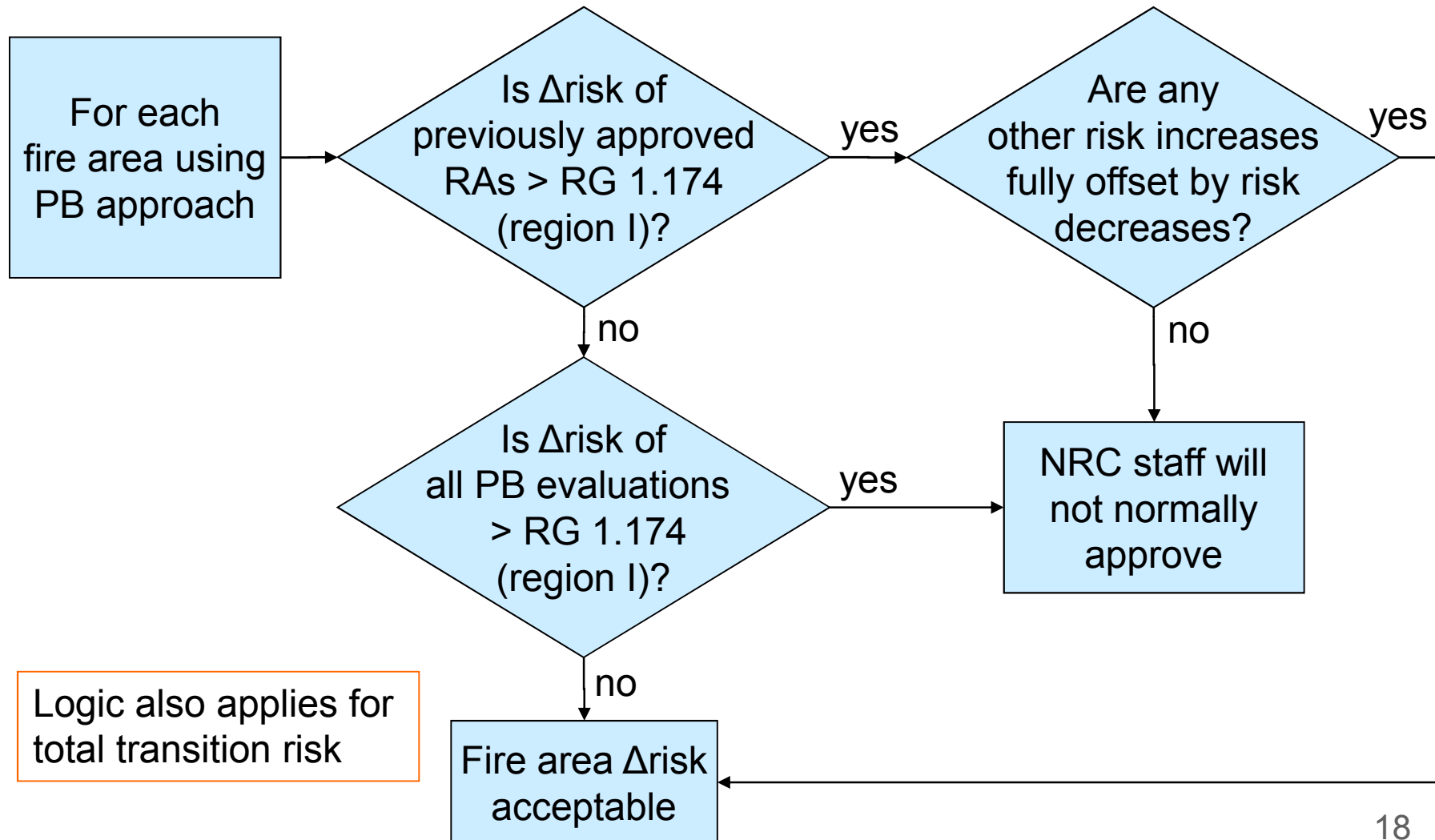


Discussion

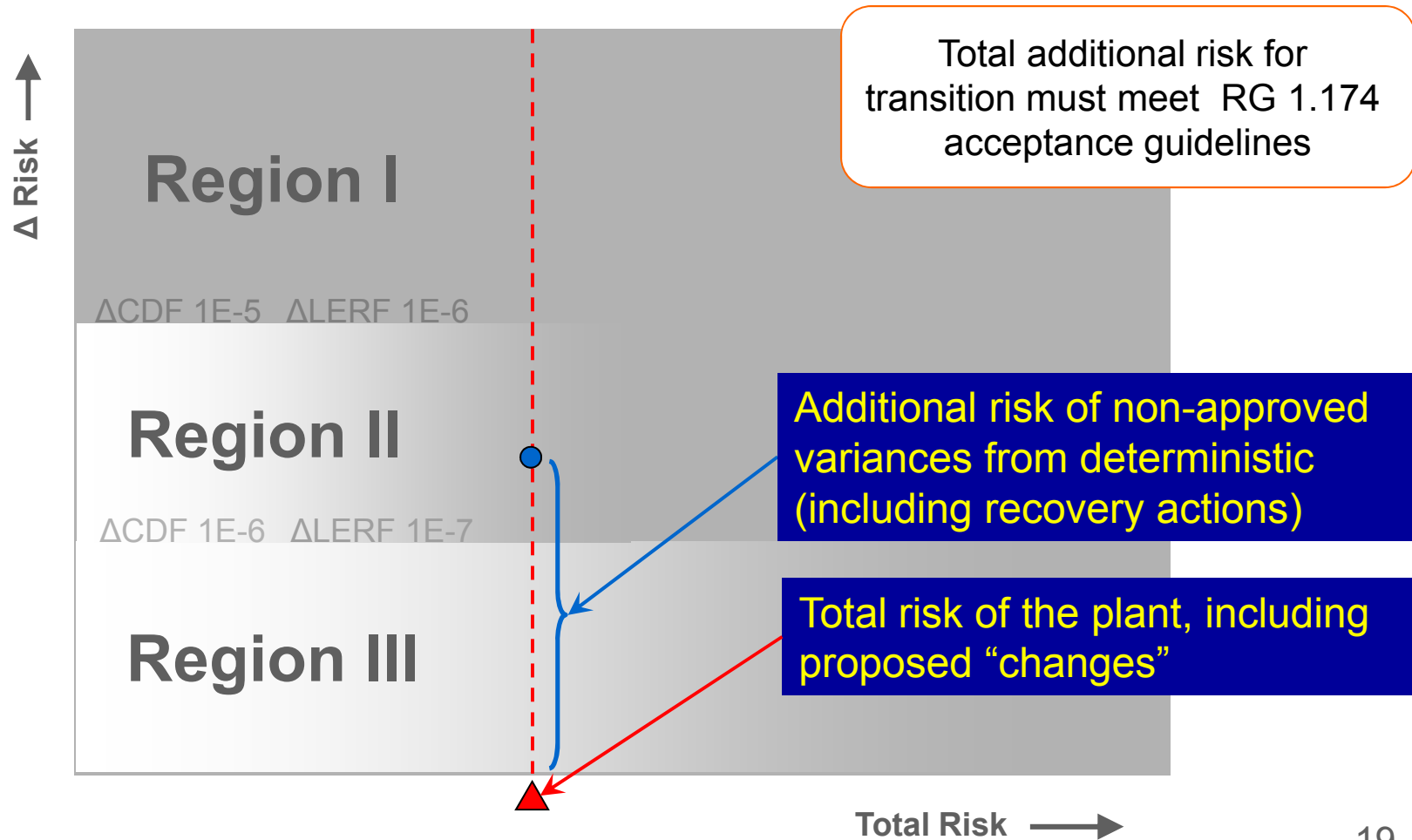
Motivation for Revision 1

- Drivers for the revision to RG 1.205
 - NEI 04-02, Revision 2
 - Closed FAQs after NEI 04-02 revision
 - Ongoing pilot plant meetings
 - Pilot plant license amendment request review, including regulatory audits at both Oconee and Harris
- Most of the changes were needed to:
 - Clarify guidance; e.g., plant change versus fire risk evaluations
 - Add missing guidance; e.g., additional risk of certain recovery actions
- The goal is to foster full and scrutable compliance with the new regulation

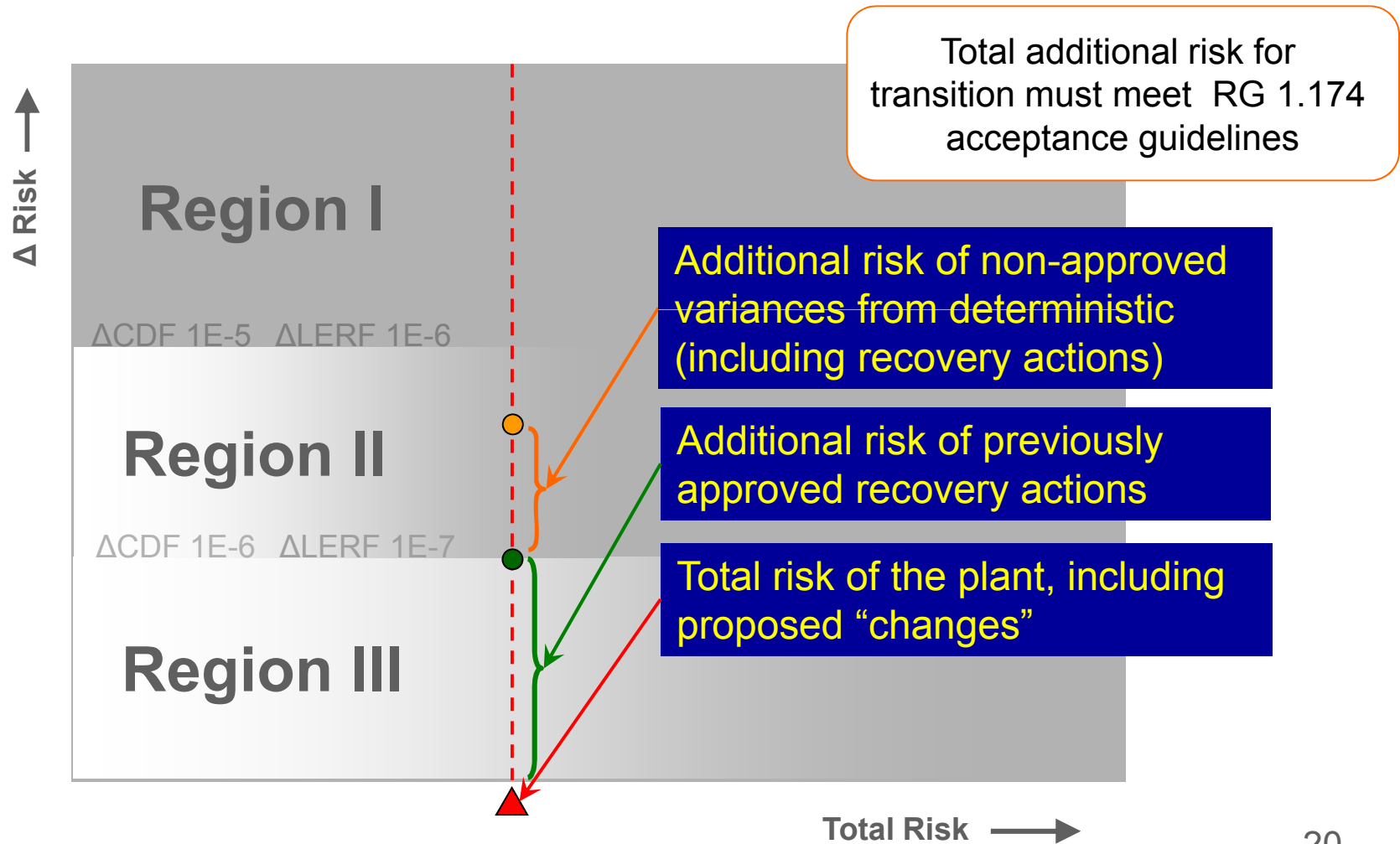
Application of RG 1.174 to NRC Staff Review During Transition (by Fire Area)



Case 1: There are No Previously Approved Recovery Actions



Case 2: Additional Risk of Previously-Approved Recovery Actions Is Within RG 1.174



Case 3: Additional Risk of Previously-Approved Recovery Actions Exceeds RG 1.174

