

Industry Comments on Draft Regulatory Guide 1.205 (ML092881133)

October 29, 2009

Improvements

- Recovery Actions
 - Process Flow chart in Slide 5

Regulatory Stability

- Regulatory Guide should reference NEI 04-02 and the extent of endorsement
 - This comment does not appear to have been incorporated
- Regulatory Guide should be issued. However, the pilot process is not yet fully vetted
 - LAR template has not been established
 - The 'new recovery action process' has not been piloted
 - Fire Risk Evaluation Calculations acceptability determination has not been completed

Specific Comments

- Recovery Actions
- License Condition
- Post-Transition Change Evaluation Process

Recovery Actions

- The following was deleted in Oct. Rev 1 from Sept. Rev. 1

Likewise, actions taken in the process of abandoning a control room and transferring to a primary control station may meet the definition of a recovery action but the additional risk of their use does not need to be evaluated to demonstrate compliance with NFPA 805.

Recovery Actions

- NRC Slide 5 characterizes recovery actions as either requiring additional risk assessment or becoming a DID recovery action
 - No alternative
 - No definition of DID Recovery Action (appears to contradict RAls on this topic)
- Need to complete the pilot of the process in NRC Slide 5
 - Success path recovery actions
 - safe & stable
 - PCS
 - VFDR final disposition

License Condition

- Proposed License Condition appears to still restrict plant changes to 'no risk increase' until modifications are complete
 - Change to Regulatory Position 3.1 Standard License Condition missed the intent of the industry concerns
 - Screening process appears in 'final' license condition and not in 'transition' license condition
 - Still does not recognize the 'endorsed' process in NEI 04-02
 - FAQ 06-008 process moved to license condition — why?

Post-Transition Change Evaluation Process

- Industry does not understand how these comments were incorporated:
 - 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 – planned Public Meeting
- Time for non-pilots to implement Regulatory Guide changes
- Inspection Process