

May 3, 2011

Dr. Said Abdel-Khalik, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
REPORT ON THE CURRENT STATE OF LICENSEE EFFORTS TO  
TRANSITION TO NATIONAL FIRE PROTECTION ASSOCIATION  
STANDARD 805

Dear Dr. Abdel-Khalik:

During the 580<sup>th</sup> meeting of the Advisory Committee on Reactor Safeguards (ACRS or the Committee) held on February 10, 2011, ACRS met with representatives of the U.S. Nuclear Regulatory Commission (NRC) staff and the industry to discuss the current state of licensee efforts to transition to National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants, 2001 Edition," which is incorporated by reference into Title 10 of the *Code of Federal Regulations* (10 CFR) 50.48(c). The Committee's efforts were in response to a staff requirements memorandum (SRM) from the Commission (SRM-M100609B) dated June 25, 2010.

In the Committee's final report, dated February 17, 2011, ACRS provided four conclusions and identified eight recommendations. The staff agrees with all the Committee's conclusions and recommendations and the technical report attached to the Committee's final report.

Specifically regarding the first ACRS recommendation to establish a mutually agreed-upon firm schedule for sequential submittals of license amendment requests for transitioning to 10 CFR 50.48(c), the staff submitted a Commission paper (SECY-11-0033, "Proposed NRC Staff Approach to Address Resource Challenges Associated with Review of a Large Number of NFPA 805 License Amendment Requests," dated March 4, 2011) proposing to stagger these license amendment submittals and reviews. The Commission approved the staff proposal with some additional direction in an SRM dated April 20, 2011.

To further address the Committee's recommendations and to provide the status of staff and industry efforts on each of these recommendations, the NRC held a public meeting with the industry on April 14, 2011. The staff is continuing to take actions consistent with the ACRS recommendations, including (1) continued engagement with the industry through the memorandum of understanding between the NRC Office of Nuclear Regulatory Research and the Electric Power Research Institute on prioritizing and performing additional fire research and data collection and review, (2) interfacing with the industry's fire probabilistic risk assessment (PRA) methods task force and expediting the reviews of new fire PRA modeling approaches and methods so that consistent interpretations and applications of these approaches and methods are achieved, and (3) ensuring that the results of the methods can be combined to

create an overall plant risk profile that reflects the risks from internal initiating events, fires, and other plant-specific significant risk contributors and that supports integrated risk-informed decision making.

The staff appreciates the Committee's timely and thorough review of this subject and its insights and recommendations. The NRC staff recognizes the ACRS commitment to safety and appreciates its continued support of performance-based, risk-informed fire protection.

Sincerely,

***/RA by Martin J. Virgilio for/***

R. W. Borchardt  
Executive Director  
for Operations

cc: Chairman Jaczko  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
SECY

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The staff appreciates the Committee's timely and thorough review of this subject, and for your insights and recommendations. The NRC staff recognizes the Committee's commitment to safety and appreciates its continued support of performance-based, risk-informed fire protection.

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