



# Regulatory Framework for Risk-Informed, Performance-Based Fire Protection

## RIC 2005 Session C4: Fire Protection

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March 9, 2005

# Regulatory Framework

- Fire Protection Legacy Issues
- Cooperation with Stakeholders
- Adopting NFPA 805
- Transition Philosophy
- NFPA 805 Benefits

# Fire Protection Legacy

- Variety of Licensing Bases  
(e.g., BTP, App. R, SRP Plants)
- Reliance on Informal Communication
- Multiple Interpretations of Appendix R
- Enforcement Challenges
- Burdensome Low Risk Noncompliances

# Cooperation with Stakeholders

- National Consensus Standard, NFPA 805
- Endorse NEI 04-02 & NEI 00-01
- Pilot Programs
  - ◆ NEI Implementation Guidance Development
  - ◆ NRC Transition Lessons Learned
- EPRI/RES Fire Requantification Program
- International Program to V&V Fire Models

# Adopting NFPA 805

- Letter of Intent Starts the Process
- Two years of Enforcement Discretion for Existing and Identified Non-Compliances
- ROP Waives Entry of Transition Findings into the SDP and Action Matrix
- License Amendment Request Replaces License Condition to Move to the New Licensing Basis

# Transition Philosophy

- Safe Today/Safe Tomorrow
- Minimize Submittals
- No Generic Backfit Required
- Enforcement Panel

# NFPA 805 Benefits

- Clean Licensing Basis
- Streamlined Corrective Action Program
- Flexible Fire Protection Program
- Focus on Risk Significant Issues
- Maintain Safety Margin & Defense-in-Depth
- Reduce Regulatory Burden

# Licensees have a choice:

Stay with your Current Deterministic  
Licensing Basis

OR

Transition to the New Risk-Informed,  
Performance-Based NFPA 805