



**RIC 2012**

**Fire Protection- Regulatory and Industry Perspectives on NFPA 805 and Circuit Analysis**

***An Industry Perspective on Preparation and Submittal of an NFPA 805 License Amendment Request***

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March 15, 2012**

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**Agenda**

- NextEra Energy Nuclear Fleet
- NFPA 805 License Amendment Request (LAR)
- License Amendment Request NRC Audit
- NFPA 805/LAR Process/Benefits
- License Amendment Request Issues
- Current and Future Issues



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**NextEra Energy Nuclear Fleet is in the process of transitioning to NFPA 805**

**NextEra Energy Nuclear Fleet NFPA 805 Status**

- **Duane Arnold**
  - License Amendment Request (LAR) submitted/accepted/LAR audit complete/Requests for Additional Information (RAI)
- **Turkey Point**
  - LAR submittal in 2012 – in final assembly/review
- **St. Lucie**
  - LAR submittal in 2013
- **Point Beach**
  - LAR submittal in 2013
- **Seabrook**
  - Not transitioning to NFPA 805 due to robust design and current compliance



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**License Amendment Request is complex but use of the LAR template simplifies the process**

**NFPA 805 License Amendment Request**

- **The License Amendment Request is large and complex**
  - Duane Arnold LAR was 707 pages for a single unit BWR with a small number of fire areas
- **Very deep dive into fire protection**
- **Validation of the LAR is challenging – large number of statements of fact**
- **LAR template simplifies LAR assembly and assures consistency**
  - Many details lead to a clearly defined licensing basis for fire protection



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**LAR Audits are beneficial to the overall process**

**License Amendment Request NRC Audit**

- **LAR audit was beneficial for opening a dialog on the LAR**
  - Gives the NRC staff a better understanding of the LAR
  - Gives the licensee a better understanding of what the staff wants
- **More resource intensive than expected**
- **Large number of questions**
  - Some questions are generic
  - Some issues still require additional resolution
  - LAR template needs some enhancement



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**Benefits of transitioning to NFPA 805**

**NFPA 805/LAR Process/Benefits**

- **Recognizing and fixing vulnerabilities**
- **Very deep dive into fire protection**
- **Detailed LARs and Safety Evaluation Reports providing a clear licensing basis going forward**
- **LAR template is working to standardize applications**
- **Share point sites/information portals are useful**



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**Issues still remain that inhibit a smooth transition**

**License Amendment Request Issues**

- **LAR audit can be resource intensive**
- **LAR template needs some refinement**
- **Review cycle still not predictable**
- **Still some open generic issues**
  - NEI 00-01 Revision 1 vs. Revision 2
  - Unreviewed analysis methods (UAM)
  - Level of detail for peer review Finding & Observation resolution
  - Unique application of fire protection features



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**Path forward to a smoother transition**

**Current and Future Issues**

- **Need to resolve lingering issues efficiently**
  - There is considerable lag time between completion of the LAR and issuance
  - Some of the outstanding issues are pushing schedules to the limit
- **Large number of RAIs is not efficient for the NRC or the licensee**
- **Need better predictability of review hours and schedule**
- **Large uncertainty in implementation**



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