Case for change

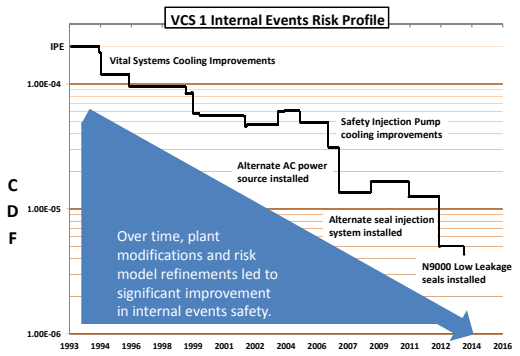
An **Operational** perspective

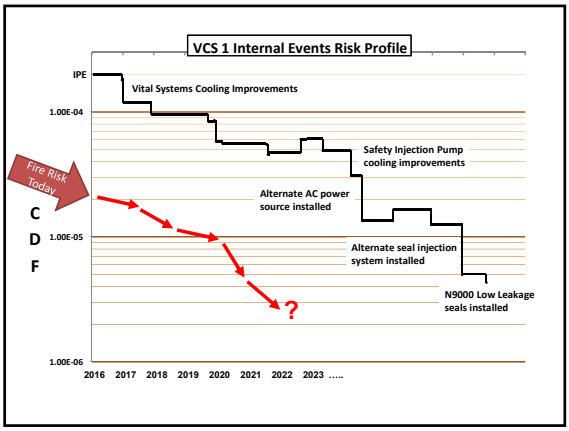
- SISBO Plant – **S**elf **I**nduced **S**tation **B**lack **O**ut
  - Once Fire Emergency declared, blackout one train of safety equipment to prevent spurious operations
  - Required >75 ex-control room actions, many of which required multiple steps, within 30-60 minutes of event start.
- An acceptable APP "R" design, but **not** desirable

Case for change

An **Organizational** perspective

- App "R"
  - Design basis poorly documented
  - Limited industry or plant staff experience still available
  - Difficult to modify
  - Regulatory uncertainty (too many operator actions)
- NFPA 805 transition
  - Investment in risk reduction and future fire risk knowledge (similar to learning curve for Internal Events PRAs – IPE)





Transition Experience

- Early open communications helped – NRC team site visit
- Fire risk techniques still evolving – continuing focus area to increase realism
- Strong Operations group ownership key to implementation
- Future streamlining of RAI process / length needed

SCE&G

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Results

- VC Summer 1 NFPA 805 SER approved 2/2015
  - Full implementation date 4/2016
- Large reduction in single point vulnerabilities
- Ex-control room operator actions reduced to *ZERO* for safe shutdown (non-control room evacuation fires)
- Operator response times extended beyond two hours
- Fire risk insights now available for full integration into site processes (Engineering, Maintenance, Training, …)
- **Fire Risk Management is now sustainable at VC Summer**