

# Donald C. Cook Nuclear Plant

## NFPA 805 Pre-LAR Submittal Meeting

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# Meeting Purpose

## Project Status

- Nuclear Safety Capability Assessment (NSCA)
- Fire Modeling
- Fire PRA
- Fire Risk Evaluation (FRE)
- Fire Safety Analysis (FSA)
- Recovery Actions (RAs)
- Monitoring Program
- NPO Analysis

## LAR Submittal and Implementation

# Nuclear Safety Capability Assessment (NSCA)

- Documents Chapter 4 Compliance
- NFPA 805 Analysis Model (SAFE)
  - Fire Area Analysis Strategies
- Identification of VFDRs
- Status - Analysis Complete

# Fire Modeling

- Used Verified & Validated (V&V'd) Fire Models
- 57 Fire Areas
  - 18 Deterministic,
  - 39 Performance Based
- Process followed NUREG/CR-6850 and the Fire PRA Standard
- Performed over 900 scenarios supporting the Fire PRA
- Status - Complete

# Fire PRA

- Fire PRA Peer Review - October, 2009 by WOG
  - Fire PRA Integrated with Internal Events PRA
  - No Significant Finding
  - 61 F&Os - 36 Suggestions, 25 Findings – All Impacts Resolved
  - PWROG Indicated That Overall, the Fire PRA Quality was Found to be Very Good with Many Elements Being Performed at the State-of-the-Art Level
- Status – Analysis Complete

# Fire Risk Evaluation

- Determined Delta Risk between Compliant Plant and NFPA 805 Plant
- Over 900 Scenarios Evaluated
- Over 260 VFDR Risk Evaluations
- Based on NUREG-6850 Guidance
  
- Status – Analyses Complete

# Fire Safety Analysis

- 57 FSAs Document Each Fire Area
  - Fire Protection Systems and Features
  - NSCA Compliance Strategy
    - VFDRs and Recovery Actions
  - Fire PRA Risk Evaluation Results
  - Radioactive Release Review
  - NPO Compliance Review
  - Monitoring Program Input
  - Defense-In-Depth and Safety Margin Review
- Status - Complete

# Recovery Actions

## Appendix R

- Cold Shutdown – 1221 OMAs
- Hot Standby – 598 OMAs

## NFPA 805

- VFDRs - 260
- Recovery Actions – 140

- Status – Evaluations Complete

# Monitoring Program

- Scoping of Fire SSCs based on Key Programmatic Elements and Engineering Assumptions
- Screening Using Risk Criteria – CDF and LERF
- Risk Target Value Determination based on Risk Assessment
- Monitoring Implementation To Be Consistent with FAQ-0059

# Non-Power Operations

- Higher Risk Evolution (HRE) Key Safety Functions (KSF) Contingency Plans/Protective Measures Identified
- Reviewed Existing Plant Outage Processes to Determine Equipment Required for KSF, Including Support Functions
- Established Defense-In-Depth Features
- Update Procedures Before “Going Live”

# LAR Status

- Using NEI Template
- Nine Packages + Assembly
  - 3<sup>rd</sup> Party Review
- Eight Packages Complete
- No Significant Gaps or Alternate Methods
- Completion Target for Final Review –  
5/31/2011

# Project Implementation

- Modifications and Implementation Items to be Completed Prior to Issuance of NRC SE
  - MOV IN 92-18 Mods
  - Conversion of CO<sub>2</sub> Systems from Manual to Automatic
  - Transient Combustibles Control with Combustible Free Zones (CFZ)
  - Develop Monitoring and NPO Programs
  - Update Procedures and Other Documentation
- Training After Receipt of NRC SE
- “Go Live” 90 Days after Receipt of NRC SE

# Summary

- Complete LAR to be Forwarded On or Before 6/29/2011
- Nothing Unique or Challenging
- No Issues Requiring Enforcement Discretion
- Modifications to be Completed Prior to Issuance of NRC SE
- “Go Live” 90 Days after Receipt of SE (To Allow for Training)