



National Fire Protection Association

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To: Cindy Bladley, Chief, RAOB

From: Greg Cade, Division Director, NFPA Gov't Affairs

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SUBJECT:

Comments submitted for NRC-2011-0269
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NFPA is the premier source worldwide for the development and dissemination of knowledge about fire and life safety.

NFPA's mission is to reduce the worldwide burden of fire and other hazards on the quality of life by providing and advocating consensus codes and standards, research, training, and education.

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January 5, 2012

Cindy Blade
Chief, Rules, Announcements, and Directives Branch (RADB),
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: [Docket No.NRC-2011-0269; Incorporation of Risk Management Concepts into Regulatory Programs]

The National Fire Protection Association (NFPA) appreciates this opportunity to provide comments to the Nuclear Regulatory Commission (NRC) concerning the Incorporation of Risk Management Concepts in Regulatory Programs. We agree with the NRC that there is a movement toward risk-informed and performance-based (RI/PB) methodologies in fire protection. We therefore commend the NRC for approving the requirements set forth in NFPA 805 *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants* as a voluntary alternative to the deterministic requirements set forth in 10 CFR 50.48.

NFPA 805 is a performance based standard that describes the methodology for applying performance-based requirements, fundamental fire protection program design and elements, determination of fire protection systems and features, and fire protection during decommissioning and permanent shutdown. This document was assembled through a consensus process with a wide range of technical experts from the nuclear field, including representation and active involvement from the NRC.

In addition to 805, NFPA has developed other performance based standards for nuclear plant fire protection that the Commission should consider. NFPA 806, the *Performance-based Standard for Fire Protection for Advanced Nuclear Reactor Electric Generating Plants Change Process* is a unique, stand-alone standard, and the only document dealing with any change process for use during construction and all phases of plant operation, including shutdown, degraded conditions, and decommissioning. As a performance-based document that was developed upon request and with involvement of the NRC, NFPA 806 is primed to become an important part of the regulatory oversight method.

The NFPA 804, *Standard for Fire Protection for Advanced Light Water Reactor Electric Generating Plants*, should also be a part of NRC's oversight and regulatory process. This

document is a prescriptive one; however NFPA 804 ensures that proper fire protection measures are implemented from the early development stages of new fuel cycle facilities. As a part of the NRC oversight procedure, the proper implementation of NFPA 804 will ensure that fire protection is fully integrated into the original plant construction and not as an exhaustive and expensive afterthought.

Thank you again for this opportunity to provide comments. We would be happy to provide further information if requested.

Sincerely,

Gregory B. Cade, Division Director
Government Affairs
National Fire Protection Association