Draft Criteria for Reviewing NFPA 805 License Amendment Requests and Safety Evaluations for SUNSI requirements

There are basically two types of information that must be removed (redacted):

1. **Drawings** - Detailed plant layout drawings used for fire protection – these provide an adversary with specific location information on safe shutdown equipment and potentially, the location of critical areas for which the licensee needs to control transient combustibles (these would be ideal spots to locate a sabotage-related fire).
2. **Specific Component/Cable Routing Dimensions** - Any specific location information on safe shutdown cables and/or equipment – such as as-built dimensional information (i.e. "…the cables for the "B" AFW pump run 3' 6" from the west wall of the Auxiliary Building in the "B" train Chiller Room). If the licensee uses general descriptions, that would not require redaction (i.e. "…the cables for the "B" AFW pump run near the west wall of the Auxiliary Building…"). One is specific, the other is general.

Lists of fire areas, the description of variations from deterministic requirements (VFDRs) used in a performance-based evaluation for a given fire area, and description of the resolution of those VFDRs give general information about the fire protection program and compliance to the requirements. They do not provide specific vulnerability location information and therefore would not require redaction.

The same is true of the tables of risk information provided in NFPA 805 license amendment requests and in our safety evaluations. A table that states that a given fire area has 3.2 E-06/yr CDF and 4.5 E-07/yr LERF does not provide specific information about why the risk is that number or how an adversary could defeat the engineering and/or administrative controls that make the risk that number.

Note that a significant amount of "risk" information is already available to the public in the form of previous risk-informed fire protection inspections and SDP activities. Each triennial fire protection inspection includes a listing of the risk-significant fire areas and a general description of how the fire areas were selected, along with a discussion of the strategy used by inspectors to challenge the licensee's post-fire safe shutdown analysis. Limiting the information on the NFPA 805 fire protection performance-based engineering evaluations would be inconsistent with that precedence already set.