NFPA 805 Industry Perspectives

December 13th, 2011
Alex Marion, Vice President
Nuclear Operations
Nuclear Energy Institute

Discussion Topics

- Where are we now?
- What is Success?
- What are Challenges to Success?
- What is Next?

Where Are We Now?

- Transition Status:
 - 48 of 104 Units Transitioning to NFPA 805
 - 2 Pilot Plant Safety Evaluations
 - Harris Has Implemented NFPA 805
 - 6 Non-Pilot LARs Submitted To Date
- Staggered LAR Submittals
- Good Interactions With the Staff

What is Success?

- Well Defined Stable Process for LAR/SE:
 - Development
 - Review/Approval
- Plant Fire Safety Improvements
- Effective Implementation
- Effective Post-Transition Processes
- Effective Use of Resources

What are Challenges to Success?

- NRC Review Costs and Schedule
- Stability in NFPA 805 LAR:
 - Preparation
 - Review Process
 - Consistency with Pilot Demonstration
- Consistency with Long Term Compliance
 - Early In Process
 - Program Maintenance and Inspections
 - Application of FPRA Insights

What is Next?

- Support Staggered LAR Review and Approvals
- More Balanced/Realistic Approach to Fire PRA
- Demonstrate compliance within a riskinformed, performance-based regulatory framework

Acronyms

- LAR License Amendment Request
- SE Safety Evaluation
- FPRA Fire Probabilistic Risk Assessment
- NFPA National Fire Protection Association