


Lessons Learned from NFPA 805 Audit Experience

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Introduction

- Beginning in mid 2011 nuclear power plant licensees began submitting license amendment requests to transition to risk-informed performance-based fire protection program.
- The NRC considers these complex licensing actions which took more than two years to complete.
- Review included various licensee documents and an on-site audit that included plant walkdowns.
- The audit process was changed about mid-way through the reviews to be more efficient and effective.



Initial NFPA 805 Review Process

- License amendment submitted.
- 60 business days (3 months) to complete acceptance review.
- Technical review begins after completion of acceptance review.
- Audit scheduled in months 5 through 8.
- Initial RAls issued in months 9 and 10

Issues Identified with Review Process that Affected Site Audit

- Audit conducted too early.
- Insufficient time to develop quality Requests for Additional Information.
- Insufficient time for licensees to review draft RAIs prior to audit.
- Delays in issuing final RAIs after audit.

Site Audit Process Improvements

- Allowed additional review time after acceptance review.
- Rescheduled audit to months 9 – 12.
- Issued draft RAIs to licensee 4 weeks prior to audit.
- Reduced delay in issuing RAIs and audit report after audit completion.

Site Audit Process Improvements

- Improved RAI quality.
- Developed RAI database to facilitate RAI searches.
- Conducted virtual audit prior to on-site audit.
- Utilized licensee virtual tour to reduce plant walkdowns.
- Conducted logistical calls with licensee's several times before the audit.



Lessons Learned from NFPA 805 Audit Experience

- Applying NFPA 805 Audit Experience to Other Complex Licensing Actions
- Questions/Comments
