REPUBLIC OF SLOVENIA
MINISTRY OF THE ENVIRONMENT AND SPATIAL PLANNING

SLOVENIAN NUCLEAR
SAFETY ADMINISTRATION

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Topical Peer Review on Fire Protection

National Action Plan

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1 Introduction

In 2014, the Council of European Union (EU) adopted directive 2014/87/EURATOM amending the Directive 2009/71/EUROATOM (Nuclear Safety Directive) in order to incorporate lessons learned following the accident at the Fukushima Daiichi nuclear power plant in 2011, and to take account of the subsequent EU stress-test findings. The revised Nuclear Safety Directive introduced a European system of Topical Peer Review (TPR) starting in 2017 and repeated every six years.

In November 2020, at its 41st plenary meeting, ENSREG decided that the second Topical Peer Review (TPR II) will focus on the topic of fire protection in nuclear installations (the first was dedicated to the Ageing Management), following the framework and expectations defined by WENRA through its TPR II Technical Specifications [1] and supporting guidance.

To begin the TPR II process at the national level, the Slovenian Nuclear Safety Administration (SNSA) issued Decree 3571-5/2022/1 [2], requiring Krško NPP to perform a comprehensive National Assessment Report (NAR) on the topic of fire protection in accordance with the WENRA Technical Specification (TS) [1]. Based on this requirement, the NAR on Fire Protection [5] at Krško NPP was prepared and approved in October 2023. The report covers all nominated installations—the Nuclear Power Plant, the Spent Fuel Dry Storage Facility and the on-site Radioactive Waste Storage Facilities—all of which operate under the Krško NPP licence and share a unified fire protection concept and systems.

The second phase, which involved the experts' review, began as soon as the NARs were published and made available for questions and comments. During this stage, peer-review experts and participating Member States submitted questions and comments on the NARs. Two workshops were organised in 2024 to discuss the self-assessment results, the submitted questions and responses, and the experts' findings, to identify general and country-specific fire protection issues. Draft versions of the TPR II Summary Report and the Country Review Reports were issued in advance to support these discussions.

In the third phase, the Slovenian Country Review Report (CRR) [3] was issued, along with CRRs for the other participating countries and the overall TPR II Summary Report [4]. These documents identified good practices, areas of good performance and areas for improvement across the topic of fire protection.

As part of the TPR II process, each country is required to prepare a National Action Plan (NAcP) that brings together all identified findings—those from the Krško NPP self-assessment, the Slovenian CRR [3] and the TPR II Summary Report [4]—and turns them into a structured set of national actions. This National Action Plan is direct outcome of the TPR II process and defines how Krško NPP addresses the identified findings.

2 Follow-up of findings from the peer review – national areas for improvement

2.1 AFI (1) – Absence of multiple spurious operation (MSO) in FHA.

Circuit analysis was not performed in accordance with the NEI 00-01 guideline. Safe Shutdown Analysis (SSA) shall consider multiple spurious operations (MSO).

2.1.1 Identified action and implementation progress

As part of TPR II activities, Krško NPP performed a self-assessment related to fire safety (SA-2022-03, “Team self-evaluation of the areas of fire protection and fire preparedness” [6]). The purpose of the assessment was to identify gaps or non-compliance between the requirements of the TPR II Technical Specification and the existing Krško NPP’s documentation and analysis.

It was identified that current SSA [7] does not fully address multiple spurious operations (MSOs) caused by fire-induced circuit failures, as described in the NEI 00-01, “Guidance for Post Fire Safe Shutdown Circuit Analysis”, Revision 4 [9]. According to NEI 00-01, fire-induced damage to cables and control circuits can cause spurious equipment operations, and multiple circuit failures may lead to multiple spurious operations that could affect safe-shutdown functions. The guidance defines credible fire-induced circuit failure scenarios and requires focusing on credible MSO combinations that are important for maintaining safe-shutdown capability, rather than evaluating all theoretical possibilities.

The existing deterministic SSA at Krško NPP was prepared in accordance with NEI 00-01 and considers spurious operation only for safe-shutdown equipment and only for a single fire-induced circuit failure. Since it does not evaluate scenarios involving multiple fire-induced circuit failures that could result in multiple spurious operations and unintended equipment actions, this was identified as a gap that needs to be addressed.

Accordingly, Krško NPP will perform a structured deterministic MSO analysis in line with NEI 00 01, with a focus on credible MSO scenarios. This will ensure that relevant MSO scenarios are addressed and that necessary operator actions are defined.

Krško NPP will address the impact of credible Multiple Spurious Operation (MSO) scenarios in the deterministic safe shutdown analysis in accordance with NEI 00-01 guidance. The development of the MSO assessment in line with NEI 00-01 is currently underway and will be performed as part of the broader Fire PSA project.

NEK current status: The MSO assessment is expected to be completed by December 31st 2027.

SNSA position: SNSA will monitor the progress of the MSO assessment in the scope of a thematic inspection dedicated to fire protection in 2027.

2.1.2 Applicability to represented installations

All nominated installations—the Nuclear Power Plant, the Spent Fuel Dry Storage Facility and the on-site Radioactive Waste Storage Facilities—operate under the Krško NPP licence and share a unified fire protection program, FHA and Fire PSA, the MSO assessment will cover the entire plant.

3 Follow-up of other findings resulting from the self-assessment

The country-specific findings from the TPR II peer review process related to Krško NPP are documented in the Slovenian Country Review Reports and have been previously explained in Topical Peer Review Report - National Assessment Report (NAR) [5].

3.1 Nuclear Power Plant, Krško NPP

3.1.1 Fire Safety Analysis

3.1.1.1 Non-compliance with 10 CFR 50 Appendix R Requirements

Design of Krško NPP does not meet full compliance with the 10CFR50, Appendix R [10] separation guidelines (20 feet separation between trains etc.) especially in some common (both train components are within the same rooms/areas). One of the goals for the recently implemented Safety Upgrade Program (SUP) [11] was to provide alternative systems to ensure the capability for all the safety functions even if the fire started in such common areas and consequentially the equipment from both trains can be affected.

3.1.1.1.1 Krško NPP Response

During the initial Safe Shutdown Analysis (SSA), performed in accordance with 10 CFR 50 App. R, it was found that some fire areas did not fulfil 10 CFR 50 Appendix R requirements. One of the requirements states that at least one train of equipment needed to shutdown the plant in case of fire must be protected. Krško NPP developed the resolution measures for these findings, as documented in the “NE Krško Fire Protection Action Plan” [12] and implemented plant modifications to address them. The most important modifications were implemented first, based on their contribution to Core Damage Frequency (CDF >10E-6). An additional re-evaluation was performed after implementation of these modifications, as documented in NEK ESD/TR-23/09 “NE Krško Fire Protection Plan Update” [13] assessment document. Modifications for most critical fire areas (the ones which most significantly reduced fire CDF) were performed between 1998-2021, as described in National Assessment Report [5]. Since then, Krško NPP FHA engineers have evaluated all changes against Fire Protection requirements and updated the analyses to reflect the as-built plant configuration.

Therefore, Krško NPP has implemented significant improvements in the field of Fire Protection Area since the issuance of the first Krško NPP FHA - Important physical modifications, significant Fire Protection Program enhancements, organisational changes and new procedures have been prepared and implemented.

Following the Fukushima accident, mobile equipment for the Safe Shutdown and for Firefighting (additional mobile pumps, truck with the water cannon etc.) was introduced. The recently implemented Safety Upgrade Program (SUP) [11] further enhanced fire safety of the Krško NPP,

as these systems provide an alternative/dedicated shutdown capability and support safe shutdown under fire conditions.

As already identified in NAR, there are fire areas that are not fully in compliance with the Appendix R requirements and those deviations are compensated with appropriate administrative procedures (fire response procedure, control of combustible material, etc.).

NEK position: Additional actions are not needed. Issue is considered closed.

SNSA position: SNSA agrees with the presented explanation and considers this issue closed.

3.1.1.2 Fire PSA Update

The fire PSA needs to be updated with current international practice, and also to include all modifications of the Safety Upgrade Program.

3.1.1.2.1 Krško NPP Response

Krško NPP developed its fire Probabilistic Safety Analysis (PSA) together with the rest of its PSA already in the 1990's and the fire PSA was developed based on at the time valid standards and international practice. Since the Krško NPP's PSA is a living process, the Fire PSA was updated occasionally to consider major upgrades in the plant (e.g. Fire Hazard Analysis Update, Fire Protection Action Plan improvements, Installation of Emergency Control Room).

In 2020, International Atomic Energy Agency (IAEA) conducted the expert mission to with the objective to discuss the current Fire PSA of Krško NPP and to discuss the details of the latest standards and good practices associated with Fire PSA. The mission highlighted areas for potential improvement, for upgrading the Krško NPP's Fire PSA to meet the requirements of the latest PSA standards. The review findings were documented in the IAEA report to Slovenian Nuclear Safety Administration (SNSA) authority. SNSA accepted that the review recommendations related to the fire PSA analyses will be treated as a PSR3 issue and that they will be addressed within the Krško NPP PSR3 Action Plan [14].

NEK current status: An update of the Fire Probabilistic Safety Analyses (Fire PSA), as part of PSR3 Action Plan (PSR3-NEK-9.2) is underway. The update of the analyses is expected to be completed by December 31st, 2027.

SNSA position: NEK was asked to inform SNSA about the preliminary results, when ready, or partial reports regarding the new Fire PSA analysis. The SNSA will check the progress of addressing this issue at the next thematic inspection dedicated to fire safety, presumably in 2027.

3.1.2 Fire Prevention

There are no identified weaknesses related to fire prevention at NPP Krško.

3.1.3 Passive Fire Protection

There are no identified weaknesses related to passive fire protection at NPP Krško.

3.1.4 Active Fire Protection

3.1.4.1 Seismic Qualification of Fire Protection Systems

Fire Protection systems are not seismically designed as required by RG 1.189 [16]. Nevertheless, the generic studies were performed under NUREG-1211 which indicated that enough margin exists in design of piping system, even though the system is not seismically designed.

3.1.4.1.1 Krško NPP Response

In scope of TPR II National Assessment Report (NAR), a weakness related seismic qualification of the Fire Protection (FP) system was identified, i.e. Fire Protection (FP) system at Krško NPP is not seismically designed as required by RG 1.189.

Krško NPP follows NRC RG 1.189, except requirements for FP seismic qualification, as noted in USAR [15]. The Fire Protection System is not seismically qualified and is not classified as a safety system; however, it is implemented with Augmented Quality (AQ) measures in accordance with plant requirements. Despite not being safety-related, the system is designed so that its operation or failure does not create unsafe conditions for safety-class equipment or for the safe operation of the plant. The routing of fire protection piping minimizes interaction with Safety Class equipment, and piping located within seismically qualified charcoal filters or near the main reactor coolant pumps is additionally supported to withstand seismic loads. Key components such as each charcoal filter plenum and each main reactor coolant pump are protected by separate manually operated water spray systems, while floor drains in all sprinklers protected areas and areas with fire protection piping ensure controlled water removal after potential damage. Additionally, in these areas all equipment is installed on raised concrete pads, all equipment openings are oriented downward to prevent water ingress and the tops of the cabinets are enclosed with no openings. The arrangement of the fire detection and alarm systems limits the impact of seismic disturbances and prevents the loss of overall system functionality due to local failures. Although not seismically qualified, the FP system's layout and structural support provide adequate robustness to avoid causing hazards to safety related systems following an earthquake.

The Individual Plant Examination (IPE) [17] project was conducted at Krško NPP, which also included an examination of the seismic resistance of non-safety piping systems. The evaluation concluded that a high-level of seismic resistance of pipeline exists in Krško NPP SSCs. Within the scope of design modifications, NEK implemented all improvements proposed under the IPE related to seismic resistance of systems and the interaction of systems with hazardous systems. Generic studies, performed in accordance with NUREG 1211 ("Regulatory Analysis for Resolution of Unresolved Safety Issue A-46, Seismic Qualification of Equipment in Operating Plants" [18]), also demonstrated that there is sufficient design margin even for pipelines that were not originally designed for seismic conditions. Based on the results of these studies, it is assessed that additional seismic strengthening of piping systems at NEK is not required.

Additionally, the analyses of combinations of fire and other initiating events, documented in a DCM-TD-040, "Deterministic Analysis of Combinations of Fire and Other Events" [19], also addressed the interaction between fire and seismic events. Since the FP system is not seismically qualified, an earthquake could disable parts of the fixed fire protection equipment. For this reason, post-seismic inspections of the FP system (sprinklers, tank, piping, control panels and pumps) are recommended to identify possible degradation. If post-seismic inspections identify any impairment, fire protection functions can be maintained through established alternative method, including portable extinguishers, fire trucks and mobile pumps. This equipment is stored in a separate, seismically qualified building. An adequate level of fire protection can be provided following a seismic event, even without formal seismic qualification.

NEK position: Additional actions are not needed. Issue is considered closed.

SNSA position: During a thematic inspection, NEK demonstrated that despite the lack of seismic classification of the fire protection system (FP), it does not affect the safety systems of the NPP. With additional systems that provide alternative cooling of the reactor core and were introduced as part of the NPP safety upgrade program, core cooling and prevention of releases in the event of an earthquake and fire are assessed as successful even in the event of a failure of the FP system. NEK proves this, among others, with the mentioned analysis [19]. SNSA for this reason agrees with the NEK's position and considers this issue irrelevant for the TPR NAcP and therefore closed.

3.2 Dedicated Spent Fuel Storage Facilities

3.2.1 Fire Safety Analysis

There are no weaknesses identified in CRR Slovenia for Fire Safety Analysis related to Spent Fuel Dry Storage of Krško NPP (SFDS).

3.2.2 Fire Prevention

There are no weaknesses identified in CRR Slovenia for Fire Prevention area related to Spent Fuel Dry Storage of Krško NPP (SFDS).

3.2.3 Active Fire Protection

There are no weaknesses identified in CRR Slovenia for Active Fire Protection area related to Spent Fuel Dry Storage of Krško NPP (SFDS).

3.3 On-site Waste Storage Facilities

3.3.1 Fire Safety Analysis

3.3.1.1 Required FHA Updates: Radwaste Storage Facility (RWSF) as a Separate Fire Area

There are no separate FHA [7] for waste storage facilities (WSF) buildings, particularly for radioactive waste storage facility (RWSF) (YD-22). It should be highlighted that the fire risk in RWSF is quite high (level 4), as is noted in TD-6, Fire Protection Program [20]. Krško NPP will consider RWSF as a separate fire area in the next revision of fire safety analysis – FHA.

3.3.1.1.1 Krško NPP Response

The Rad Waste Storage Facilities (RWSF) were originally classified as a single fire zone (YD-22) within the "Yard" (YD) fire area, in line with the Fire Hazard Analysis (FHA), rev. 9 [7] . This fire area covers the general outdoor zone of the site surrounding the main plant buildings.

RWSF stores low- and intermediate-level radioactive waste. According to the Regulation on the methodology for determining fire hazard assessment (Official Gazette RS 70/1996 and 5/1997), the RWS building has been identified as a fire area with a high fire hazard (level 4). The overall fire hazard rating would normally be level 6, but it is reduced to level 4 because the room is equipped with a fire detection system, there is an adequate water supply for firefighting, and the Krško NPP has an industrial firefighting unit of category II or IV.

NEK current status: The Radwaste Storage Facility (RWSF) was identified as an independent fire area (RWS) in the latest revision of the FHA, Rev. 10 [8], issued after the TPR II review. This fire area has a negligible combustible load since all materials are enclosed in the sealed drums and packaged in accordance with waste acceptance criteria for storage.

SNSA position: The issue has already been resolved in FHA, Rev.10. SNSA agrees that the work on this issue is completed.

3.3.2 Fire Prevention

There are no identified weaknesses related to fire prevention at On-site Radioactive Waste Storage.

3.3.3 Passive Fire Protection

There are no identified weaknesses related to passive fire protection at On-site Radioactive Waste Storage.

3.3.4 Active Fire Protection

3.3.4.1 Absence of Fire Detection System in Fire Area DB-1

Fire detection system is missing in fire area DB-1 (old steam generators warehouse with a negligible combustible load).

3.3.4.1.1 Krško NPP Response

The fire detection system is not installed in fire area DB-1, inside Decontamination Building (DB), where the old steam generators are stored. When the DB was originally designed, the fire study—performed in accordance with the standards applicable at that time—did not require a fire detection system (smoke detectors) in DB-1, since no combustible materials were expected to be present. An indirect fire detection capability is provided through the ventilation system, which operates continuously and contains smoke detectors installed in the associated ventilation ducts.

According to the Fire Hazard Analysis (FHA) [8], the total combustible load in the DB-1 fire area is negligible (13 MJ/m^2), with an estimated fire duration of about one minute. Current standards and guidelines, however, require fire detection in all fire areas, regardless of the type or amount of combustible material present.

NEK current status: This issue was identified and recorded through the Corrective Action Program (CAP). An analysis was performed, resulting in the recommendation to extend the fire detection system to the DB-1 fire area, through design change modification, in spite of the fact that fire detection was not required in DB-1 fire area under the original design requirements. The installation of the fire detection system (a smoke detector) is currently completed.

SNSA position: Since the installation of the fire detection system in the DB-1 fire area has been carried out, SNSA agrees that this issue is resolved.

4 Consideration of the other findings from the peer review to enhance fire protection

Although reporting under Section 4 is voluntary, Krško NPP briefly reviewed the good practices from Annex IV, the compilation of national areas of good performance listed in Annex VI and all areas for improvement (AFIs) listed in Annex VII of the TPR II Summary Report to evaluate their relevance and potential applicability to Krško NPP.

The review showed that identified findings are already covered through the existing Fire Protection Program, including regular periodic updates of the Fire Hazard Analysis (FHA), the corrective action program, configuration management processes, and regulatory oversight.

In line with the voluntary and graded approach recommended for this section, no further reporting is provided.

5 Conclusions

This National Action Plan (NAcP) represents the final stage of Slovenia's participation in the Topical Peer Review II (TPR II) on fire protection, conducted under the framework of the European Nuclear Safety Regulators Group (ENSREG) and based on the WENRA Technical Specification [1]. The process included a detailed self-assessment by Krško NPP, an international peer review by experts from participating countries, and the preparation of both the Country Review Report (CRR) [3] and the TPR II Summary Report [4]. The results show that fire protection at Krško NPP is established and maintained in accordance with applicable nuclear safety requirements, with regular updates and improvements implemented through plant programs and analyses.

Krško NPP has implemented numerous modifications and organisational measures to improve fire prevention, detection, suppression and safe-shutdown capability. They include the implementation of the Fire Protection Action Plan [13], continuous updates of the Fire Hazard Analysis (FHA) [8], development of the Fire Probabilistic Safety Assessment (Fire PSA), introduction of mobile equipment following the Fukushima accident, introducing an alternate safety train in scope of Safety Upgrade Program (SUP) [11], including the Emergency Control Room (ECR). These measures improve the plant's capability to cope with fire scenarios and provide additional diversity and independence in maintaining key safety functions.

The peer review identified one national Area for Improvement (AFI) related to the absence of a comprehensive Multiple Spurious Operations (MSO) assessment within the deterministic Safe Shutdown Analysis (SSA) as part of the Fire Hazard Analysis (FHA). Krško NPP has defined actions to address this finding in coordination with the ongoing Fire PSA update project, to ensure alignment with current methodologies and guidance. Completion of the MSO analysis is planned by December 31st, 2027.

In addition to the peer-review findings, plant documentation and analyses show that fire protection at Krško NPP meets the expectations of the TPR II Technical Specification. No weaknesses were identified in the areas of fire prevention, passive fire protection or active fire protection systems. Certain plant-specific topics, such as the seismic qualification of fire protection systems or the absence of fire detection in a limited storage area (fire area DB-1), have been evaluated through engineering assessments and the Corrective Action Program (CAP). Where appropriate, compensatory measures are already implemented or design modifications are planned, such as the installation of a fire detection system in the DB-1 fire area, scheduled for completion by March 1st, 2027.

Furthermore, Krško NPP evaluated all good practices, areas of good performance and areas for improvement identified in the TPR II Summary Report [4]. The assessment showed that relevant good practices are already implemented through existing plant programs and procedures, the corrective action program, configuration management processes, and regulatory oversight and that no additional actions are required based on generic findings from other countries.

The TPR II process and review results confirmed that existing fire protection arrangements at Krško NPP are adequate and consistently maintained, supported by deterministic and probabilistic safety analyses, and regulatory oversight from the Slovenian Nuclear Safety Administration (SNSA).

6 References

[1] WENRA Topical Peer Review 2023; Fire Protection Technical Specification for the National Assessment Reports.

[2] SNSA Decree: Strokovni pregled (TPR) na temo požarne varnosti in priprava Tehničnega poročila po Direktivi EU o jedrski varnosti – 3571-5/2022/1 from 05.09.2022.

[3] European Nuclear Safety Regulators Group ENSREG, 2nd Topical Peer Review – 'Fire Protection' Country Review Report (CRR), Slovenia.

[4] European Nuclear Safety Regulators Group ENSREG, 2nd Topical Peer Review Summary Report "Fire Protection".

[5] Topical Peer Review on Fire Protection at Krško NPP 2023 – Final report.

[6] SA-2022-03, "Team self-evaluation of the areas of fire protection and fire preparedness, Rev. 0, 2022.

[7] Fire Hazard Analysis (FHA), Rev. 9.

[8] Fire Hazard Analysis (FHA), Rev. 10.

[9] NEI 00-01, "Guidance for Post Fire Safe Shutdown Circuit Analysis", Rev. 4, 2019.

[10] 10CFR50, Appendix R "Fire Protection Program for Nuclear Power Facilities".

[11] DCM-RP-083, "Program nadgradnje varnosti NEK (The Krško NPP Safety Upgrade Program)", Rev. 3, 2017.

[12] NEK-FPAP – Fire Protection Action Plan, Rev.3, Lambright Technical Associates, Inc.,September 1999.

[13] NEK ESD/TR-23/09, "NE Krško Fire Protection Plan Update", Rev.0, 2010.

[14] PSR3-NEK-9.2, PSR3 Action Plan, Rev. 0, 2023.

[15] USAR, Revision 32, 2025.

[16] NRC RG 1.189, "Fire Protection for Nuclear Power Plants".

[17] IPE-W-NEK-95-236, »KRSKO IPEEE PLANT EQUIPMENT SEISMIC FRAGILITY ANALYSIS REPORT«, 1995.

[18] NUREG 1211 ("Regulatory Analysis for Resolution of Unresolved Safety Issue A-46, Seismic Qualification of Equipment in Operating Plants", February 1987.

[19] DCM-TD-040, "Deterministic Analysis of Combinations of Fire and Other Events", Rev.0, 2023.

[20] TD-6, Fire Protection Program, Rev. 7, 2024.

7 Annex A - Summary table of the actions planned/implemented

Section of NAcP	**Reference no of the finding**	**Installation type/name** (as relevant)	**Thematic**	**Finding**	**Action** (specify if planned/underway/completed)	**Deadline**	**Regulatory authority's comment on progress**
2	AFI 1	NPP – Krško	FHA	Absence of multiple spurious operation (MSO) in FHA	Underway	31.12.2027	Progress/results will be checked on a thematic inspection in 2027.
3	NAR-section 2.1.6.1	NPP – Krško	FHA	Design of Krško NPP does not meet full compliance with the Appendix R requirements	No additional actions are planned	N/A	Closed
3	NAR-section 2.1.8	NPP – Krško	FHA	Fire PSA update	Underway	31.12.2027	Progress will be checked on a thematic inspection in 2027.
3	NAR-section 2.1.8	NPP – Krško	Active Fire Protection	Fire Protection (FP) system at Krško NPP is not seismically designed as required by RG 1.189	No additional actions are planned	N/A	Closed
3	NAR-section 2.5.10	Radwaste Storage Facility (RWS)	FHA	There are no separate FHA for WSF buildings, particularly for RWSF	Completed	N/A	Completed
3	NAR-section 2.5.10	NPP – Krško	Active Fire Protection	Absence of Fire Detection System in Fire Area DB-1	Completed	N/A	Completed

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