

Statistical Characterization of Heat Release Rates from Electrical Enclosure Fires for Nuclear Power Plant Applications¹

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Abstract: Since the publication of NUREG/CR-6850 / EPRI 1011989 in 2005, the US nuclear industry has sought to re-evaluate the default peak heat release rates (HRRs) for electrical enclosure fires typically used as fire modeling inputs to support fire probabilistic risk assessments (PRAs), considering them too conservative. HRRs are an integral part of the fire phenomenological modeling phase of a fire PRA, which consists of identifying fire scenarios which can damage equipment or hinder human actions necessary to prevent core damage. Fire ignition frequency, fire growth and propagation, fire detection and suppression, and mitigating equipment and actions to prevent core damage in the event fire damage still occurred are all parts of a fire PRA. The fire growth and propagation phase incorporates fire phenomenological modeling where HRRs have a key effect. A major effort by the Electric Power Research Institute and Science Applications International Corporation in 2012 was not endorsed by the US Nuclear Regulatory Commission (NRC) for use in risk-informed, regulatory applications. Subsequently the NRC, in conjunction with the National Institute of Standards and Technology, conducted a series of tests for representative nuclear power plant electrical enclosure fires designed to definitively establish more realistic peak HRRs for these often important contributors to fire risk. The results from these tests are statistically analyzed to develop two probabilistic distributions for peak HRR per unit mass of fuel that refine the values from NUREG/CR-6850, thereby providing a fairly simple means by which to estimate peak HRRs from electrical enclosure fires for fire modeling in support of fire PRA. Unlike NUREG/CR-6850, where five different distributions are provided, or NUREG-2178, which now provides 31, the peak HRRs for electrical enclosure fires can be characterized by only two distributions. These distributions depend only on the type of cable, namely qualified vs. unqualified, for which the mean peak HRR per unit mass is 11.3 and 23.2 kW/kg, respectively, essentially a factor of two difference. Two-sided, 90th percentile confidence bounds are 0.091 to 41.15 kW/kg for qualified cables, and 0.027 to 95.93 kW/kg for unqualified cables. From the mean (~70th percentile) upward, the peak HRR/kg for unqualified cables is roughly twice that for qualified, increasing slightly with higher percentile, an expected phenomenological trend. Simulations using variable fuel loadings are performed to demonstrate how the results from this analysis may be used for nuclear power plant applications.

Keywords: Electrical Enclosures, Cable Fires, Heat Release Rates, Fire Modeling, Nuclear Power Plants

¹ The views expressed herein are strictly the authors' personal ones and do not necessarily represent any opinion or position by the U.S. Nuclear Regulatory Commission.

1. INTRODUCTION

Since the publication of NUREG/CR-6850 / EPRI (Electric Power Research Institute) 1011989 in 2005, the nuclear industry has sought to re-evaluate the default peak heat release rates (HRRs) and their distributions for electrical enclosure fires, considering them too conservative. [1] These were based on analyst judgment using test results from Sandia National Laboratories [2,3] in the late 1980s and the Technical Research Centre of Finland [4,5] in the mid-1990s. Eschewing further experiments, EPRI and Science Applications International Corporation (SAIC) published EPRI 1022993 in 2012 [6], which built on these test results and additional ones from the Technical Research Centre of Finland [7] in 2003 and Melis, et al., [8] in 2004. The result was a statistical/probabilistic-based model yielding adjusted, and presumably more realistic, HRRs from electrical enclosure fires as a function of parameters such as cable qualification, volumetric fuel density, and ventilation. However, in a letter to the Nuclear Energy Institute (NEI) in 2012, the NRC chose not to endorse EPRI 1022993 for use in risk-informed, regulatory applications, citing a need for "... significant additional data ... to develop improved guidance on electrical cabinet HRR ... [which] are unlikely to be found in available literature." [9] An effort to modify the HRR information in NUREG/CR-6850 (EPRI 1011989) by NRC-RES (Office of Nuclear Regulatory Research) has been completed (NUREG-2178). [10] This paper provides an alternative to this based exclusively on the test results from the NRC-RES program.

The testing program, discussed in Section 2 (below), utilized both "qualified" and "unqualified" cables. A "qualified" cable is typically one that has passed the IEEE (Institute of Electrical and Electronics Engineers)-383 flame spread test. [11] These correspond closely to cables with thermoset (TS) and thermoplastic (TP) insulation, respectively. Cables are generally classified into two types, based on the jacketing material for the electrical conductors: (1) TP polymers that can be deformed and/or liquefied by heat addition and can be cooled down to solid form; and (2) TS polymers which cannot. In general, TS polymers have better mechanical properties, are stiffer and can withstand higher temperatures during longer periods of time than TP polymers. As a result, the temperature at which fire-induced electrical failure occurs is higher for TS than TP cables, i.e., given a certain exposure temperature, one would expect the TP cable to fail electrically more readily than the TS. In addition, flame spread rate across TP cables has been found to be roughly three times greater than that across TS cables; the former also exhibits HRRs per unit area roughly twice that of the latter. [12] Therefore, one would expect peak HRRs for electrical enclosures with qualified (i.e., mainly TS) cables to be less than those for enclosures with unqualified (i.e., mainly TP) cables, and this has been demonstrated as discussed below.

2. HELEN-FIRE TEST DATA

In 2013-2014, the NRC contracted with the National Institute of Standards and Technology (NIST) to complete a series of over 100 tests at the Chesapeake Bay Detachment of the Naval Research Laboratory to measure HRRs from electrical enclosure fires, the HELEN-FIRE program (Heat Release Rates of Electrical Enclosure Fires). [13] Eight electrical enclosures from the Bellefonte Nuclear Generating Station, a plant owned by the Tennessee Valley Authority but never operated, were obtained, tested, and then reconfigured with varying amounts and types of electrical cables to represent expected configurations typical at nuclear power plants. Detailed descriptions of the tests and results are available in NUREG/CR-7197. Only a summary is presented here, since the focus of this paper is the analysis of the test results therein.

Electrical enclosures were situated beneath an oxygen consumption calorimeter hood designed to measure the HRR of fires from approximately 100 kW to 10 MW. This calorimeter, 2.4 m by 2.4 m (8 ft by 8 ft) and 2.4 m (8 ft) off the floor, was located beneath the large hood at the facility and instrumented to measure volume flow, gas temperature and oxygen concentration of the exhaust gases. Eight different

configurations of electrical enclosures were tested as typical of the types found at nuclear power plants. Table 1 shows the results for 117 of the tests in the first nine columns. Excluded are tests where the fuel mass, which became a key parameter in this analysis, was not recorded. There were many variables among the tests, as characterized by the various columns, summarized as follows from the detailed descriptions in Reference 13. **(1) Test**—Test ID from [13]. **(2) Encl.**—Cabinet ID from [13]. Eight different types of enclosures were used in the experiments. **(3) Ignition HRR**—HRR of the ignition source in kW. Three types of ignition sources were used in the experiments: cartridge heaters, line burners, and pans of liquid fuel. **(4) Preheat HRR**—HRR of the heater to preheat the enclosure in kW. A variety of heaters were used to pre-heat the interior of the enclosures prior to or at the beginning of each experiment. **(5) Fuel Mass**—Total mass of the cables installed in the enclosure in kg. **(6) Cable Class**—The cables were classified as either qualified (Q) or unqualified (UQ) based on performance in a flame spread test (IEEE 383). **(7) Door Position**—The doors of the enclosure were either open or closed. **(8) Peak HRR**—Maximum HRR of the enclosure contents (cables) recorded during the test in kW. Note that the HRRs of the ignition source and the heater to preheat the enclosure were subtracted from the measured HRR. **(9) Total Energy Release**—Total heat released in the test in MJ. This is equal to the area under the HRR versus time curve. **(10) Peak HRR/Mass (kW/kg)**—Peak HRR divided by fuel mass in kW/kg (developed for this paper).

Examination of the results from the tests immediately indicated that there was high variability in the peak HRRs with limited control of any potential variables that would be relevant for predictive purposes when applied to actual electrical enclosure fires at nuclear power plants. For example, neither ignition HRR nor preheat HRR would be a parameter relevant to actual enclosure fires during operation. Cable class and door position, the distinction for which “closed” vs. “open” was questionable (see Section 3 below), offered only binary differentiation. As a result, the only quantifiable control variable against which a correlation (regression) might be obtained for peak HRR was fuel mass, but this proved not to be feasible.

At this point, rather than discard the test results or default to a subjective, opinion-based approach [10], the authors took a different tack. Since HRR is known to be dependent on fuel mass (recognizing there is variability depending upon fuel configuration and the degree to which fuel is consumed, discussed further in Section 3), they explored the efficacy of a distributional analysis for a derived metric, that being peak HRR per fuel mass as shown below by the ***bold italicized*** columns. The fuel mass would be a quantifiable parameter for actual electrical enclosure fires at nuclear power plants. Furthermore, the fact that the potential influencing variables, other than fuel mass, were not rigorously controlled somewhat parallels what might be expected in actual conditions for electrical enclosures at a nuclear power plant, where wide variation would be expected. Therefore, the HELEN-FIRE results, at least for this selected metric, could be reasonably representative and reproducible for use in fire phenomenological modeling in PRA applications.

Several iterations of Kolmogorov-Smirnov (K-S) pairwise comparisons for poolability of data sets using the calculated peak HRR per fuel mass (combustible loading), i.e., kW/kg, were performed, e.g., preheat vs. none, closed vs. open door, until cable class proved to be the most practical and statistically meaningful characteristic. The data are sorted into two groups, Q (unshaded) and UQ cables (shaded) in ascending order of peak HRR/mass.

TABLE 1. HELEN-FIRE Test Results Sorted by Peak HRR per Unit Mass and Cable Class

Test	Encl.	Ignition HRR (kW)	Preheat HRR (kW)	Fuel Mass (kg)	Cable Class	Door Position	Peak HRR (kW)	Total Energy Release (MJ)	Peak HRR/Mass (kW/kg)
17	4	0.7	0	2.7	Q	Open	0	0	0.000
15B	5	0.7	0	3.23	Q	Closed	0	7	0.000
86A	7	5	0	1.96	Q	Open	0	15	0.000
26	1	0.7	0	3.03	Q	Closed	1	0	0.330
27A	1	0.7	14	2.99	Q	Closed	1	9	0.334
50	4	22	0	2.65	Q	Closed	1	21	0.377
61	1	0.8	19	11.84	Q	Closed	5	29	0.422
27B	1	0.7	14	2.99	Q	Closed	1.7	9	0.569
70	1	1.6	0	3.11	Q	Closed	2	1	0.643
62	1	1.6	19	4.1	Q	Closed	3	33	0.732
36A	2	4	0	2.71	Q	Closed	2.5	4	0.923
15A	5	0.7	0	3.23	Q	Open	3	7	0.929
19	5	0.7	0	3.23	Q	Closed	3	7	0.929
64	8	0.8	11	6.05	Q	Closed	6	13	0.992
85	7	0.8	0	1.96	Q	Closed	2	2	1.020
16	5	0.7	0	1.89	Q	Open	2	2	1.058
65	8	0.8	11	5.7	Q	Closed	7	15	1.228
25	1	0.7	0	3.11	Q	Closed	4	5	1.286
73	4	1.6	22	2.88	Q	Closed	4	26	1.389
91	7	1.6	20	2.07	Q	Closed	3	26	1.449
36B	2	4	0	2.71	Q	Closed	4	4	1.476
28A	1	0.7	16	2.87	Q	Closed	4.7	17	1.638
45	5	5.5	22	2.88	Q	Closed	5	34	1.736
74	5	1.6	20	2.56	Q	Closed	5	28	1.953
21	4	0.7	0	1.89	Q	Closed	4	3	2.116
22	4	0.7	0	1.76	Q	Closed	4	4	2.273
20	5	0.7	0	1.89	Q	Closed	5	9	2.646
102	6	23	0	3.56	Q	Open	10	17	2.809
76	5	22	0	2.88	Q	Closed	9	25	3.125
28C	1	0.7	16	2.87	Q	Closed	10	17	3.484
90	7	0.8	16	3.41	Q	Closed	12	33	3.519
77A	5	5.5	24	2.56	Q	Closed	10	53	3.906
28B	1	0.7	16	2.87	Q	Closed	11.3	17	3.937
75	5	5.5	26	2.88	Q	Closed	15	57	5.208
100	6	5.5	0	6.24	Q	Closed	34	42	5.449
24	5	0.7	0	0.73	Q	Closed	4	4	5.479
43	4	16	0	2.88	Q	Closed	18	21	6.250
37	2	54	0	5.41	Q	Closed	35	27	6.470
79A	4	5.5	0	6.12	Q	Closed	40	63	6.536

Test	Encl.	Ignition HRR (kW)	Preheat HRR (kW)	Fuel Mass (kg)	Cable Class	Door Position	Peak HRR (kW)	Total Energy Release (MJ)	Peak HRR/Mass (kW/kg)
77B	5	5.5	24	2.56	Q	Closed	18	53	7.031
80A	4	5.5	19	2.77	Q	Closed	20	92	7.220
92	7	5.5	20	2.07	Q	Closed	15	37	7.246
32A	4	5.5	25	0.73	Q	Closed	5.6	35	7.671
94	7	5.5	0	4.78	Q	Closed	37	23	7.741
63	1	5.5	19	11.84	Q	Closed	92	156	7.770
46	4	19	0	5.41	Q	Closed	45	68	8.318
81	5	30	0	2.88	Q	Closed	24	48	8.333
87	7	0.8	21	3.27	Q	Closed	29	35	8.869
49	4	19	0	5.41	Q	Closed	50	76	9.242
107	1	5.5	19	5.53	Q	Open	55	51	9.946
39	8	25	0	5.68	Q	Closed	60	65	10.563
101	6	20	0	6.24	Q	Closed	66	70	10.577
79B	4	5.5	0	6.12	Q	Closed	65	63	10.621
109	8	5.5	19	5.98	Q	Closed	64	61	10.702
44	5	5.5	0	2.88	Q	Closed	31	32	10.764
84	7	0.8	20	3.27	Q	Open	37	51	11.315
78A	5	5.5	0	2.56	Q	Closed	30	27	11.719
42	4	5.5	0	2.88	Q	Closed	34	35	11.806
86B	7	5	0	1.96	Q	Open	24	15	12.245
35	8	27	0	11.37	Q	Closed	146	153	12.841
47	4	19	0	2.71	Q	Closed	40	49	14.760
32B	4	5.5	25	0.73	Q	Closed	11	35	15.068
111A	5	5.5	20	3.12	Q	Closed	49	120	15.705
98	6	20	0	7.67	Q	Closed	121	126	15.776
48	4	19	0	5.41	Q	Open	87	89	16.081
78B	5	5.5	0	2.56	Q	Closed	54	27	21.094
108	1	5.5	0	1.38	Q	Closed	32	15	23.188
51	4	30	0	1.33	Q	Open	31	34	23.308
41A	3	20	0	5	Q	Closed	122	141	24.400
34	5	35	0	1.22	Q	Closed	35	46	28.689
29	1	18	0	2.64	Q	Closed	82	76	31.061
33	5	25	0	1.46	Q	Closed	50	40	34.247
38	2	20	0	4.74	Q	Closed	169	95	35.654
80B	4	5.5	19	2.77	Q	Open	100	92	36.101
31	4	5.5	22	0.73	Q	Closed	28	45	38.356
71	1	5.5	0	3.11	Q	Closed	138	99	44.373
41B	3	20	0	5	Q	Open	232	141	46.400
30	1	18	0	1.32	Q	Closed	72	59	54.545
111B	5	5.5	20	3.1	Q	Open	268	120	86.452
82A	1	1.6	19	7.39	UQ	Closed	1	112	0.135

Test	Encl.	Ignition HRR (kW)	Preheat HRR (kW)	Fuel Mass (kg)	Cable Class	Door Position	Peak HRR (kW)	Total Energy Release (MJ)	Peak HRR/Mass (kW/kg)
99	6	5.5	0	2.3	UQ	Open	3	7	1.304
18	4	0.7	0	1.76	UQ	Open	3	3	1.705
97A	6	5.5	0	4.87	UQ	Closed	9	120	1.848
110A	4	5.5	24	3.36	UQ	Closed	7	32	2.083
59A	5	0.8	0	2.33	UQ	Open	5.3	14	2.275
69	8	1.6	13	3.53	UQ	Closed	10	22	2.833
57	5	0.8	24	1.68	UQ	Closed	5	26	2.976
110B	4	5.5	24	3.36	UQ	Open	11	32	3.274
56	5	0.8	22	1.7	UQ	Closed	8	16	4.706
106A	1	5.5	0	3.05	UQ	Closed	17	25	5.574
95	7	5.5	0	5.37	UQ	Closed	30	27	5.587
96	6	5.5	21	5.37	UQ	Closed	33	47	6.145
55	4	10	0	3.12	UQ	Closed	21	26	6.731
67A	4	5.5	0	3.36	UQ	Closed	26	21	7.738
66A	4	5.5	24	3.36	UQ	Closed	26	57	7.738
66B	4	5.5	24	3.36	UQ	Open	26	57	7.738
82B	1	1.6	19	7.39	UQ	Open	63	112	8.525
67B	4	5.5	0	3.36	UQ	Open	29	21	8.631
59B	5	0.8	0	2.33	UQ	Open	22	14	9.442
58	5	0.8	21	2.33	UQ	Closed	26	36	11.159
23	5	0.7	0	1.56	UQ	Open	18	12	11.538
60	1	0.8	19	7.39	UQ	Closed	88	96	11.908
106B	1	5.5	0	3.05	UQ	Open	38	25	12.459
112	4	5.5	0	1.68	UQ	Open	22	12	13.095
105	1	5.5	0	6.1	UQ	Closed	80	25	13.115
93	7	5.5	0	3.25	UQ	Closed	59	27	18.154
97B	6	5.5	0	4.87	UQ	Closed	89	120	18.275
89	7	0.8	0	1.15	UQ	Closed	25	10	21.739
53A	4	5.5	0	2.17	UQ	Closed	57	60	26.267
54	4	2.2	0	3.12	UQ	Open	94	41	30.128
103	6	5.5	0	1.15	UQ	Closed	42	50	36.522
68	1	0.8	0	4.74	UQ	Closed	216	121	45.570
104	1	0.8	24	4.74	UQ	Open	250	141	52.743
83	1	0.8	0	4.74	UQ	Open	577	152	121.730
52	4	5.5	0	2.17	UQ	Open	122	61	56.221
88	7	0.8	0	1.15	UQ	Closed	147	18	127.826
53B	4	5.5	0	0.54	UQ	Open	85	60	157.407

HRR/mass is a logical metric for the HELEN-FIRE test results, given the similarity of combustible composition – batches of cables with reasonably equivalent radii (r) contained in metal enclosures. In addition, for comparable levels of burning, HRR is known to be proportional to exposed surface area (A)

which, for cylindrical cables of length h with homogeneous mass density ρ , can be shown to be proportional to the mass (M) as follows:

$$M = \rho\pi r^2 h \rightarrow h = M/\rho\pi r^2$$

$$A = 2\pi rh = 2M/\rho r$$

Since radius and density are approximately constant, the proportionality with M dominates.

Some may contend that mass is not a reliable indicator of HRR, but this stems from differences in the composition of the combustibles. For equal masses of one “log” (with mass M and radius R) and a number n of “twigs” (each with mass m and radius r), both of the same density (ρ) and length (h), the ratio of HRRs is proportional to the ratio of exposed surface areas, i.e., $A_{\text{twigs}}/A_{\text{log}} = (2nm/\rho r)/(2M/\rho R) = nmR/Mr$. For equal masses, $M = nm \rightarrow \rho\pi R^2 h = n\rho\pi r^2 h \rightarrow R/r = \sqrt{n}$. Therefore, the ratio of surface areas (and HRRs) becomes $A_{\text{twigs}}/A_{\text{log}} = \sqrt{n}$. As any camper knows, it is much easier to light a bunch of twigs than a log; and, once lit, that corresponds to a higher HRR for the twigs vs. the log for equal masses. Since HELEN-FIRE tested “twigs,” it is reasonable to assume a relatively equivalent combustible composition, such that HRR should be proportional to exposed surface area and, therefore, to mass as shown above. HRR/mass is a logical choice as a characteristic metric.

Graphs for each of the data sets (peak HRR/mass, Q and UQ) were developed and, upon inspection (subsequently confirmed via χ^2 goodness-of-fit tests), fit to the gamma distribution of the following form:

$$f(x) = (x^{\alpha-1} e^{-x/\beta})/(\beta^\alpha \Gamma[\alpha])$$

where x is the peak HRR/mass in kW/kg. The alpha (scale) and beta (shape) parameters were derived from the mean and standard deviation of each data set, as shown among the statistics in Table 2. The cumulative distribution functions with both the actual and gamma-fitted data are shown in Figure 1. The choice of the gamma distribution was based not only on the relatively good fit to the experimental data, but also given precedence for its use in fire PRA applications, in particular for both the original and recently updated fire ignition frequencies as well as the original and more recent RES HRR distributions. [1,10,14]. It is quite familiar to fire PRA analysts for its flexibility and relative ease of use, especially when Bayesian updating of generic by plant-specific data is performed, a widely-used statistical method for all nuclear power plant PRAs.

Evident from the statistical analysis is that from the mean (~70th percentile) upward, the UQ peak HRR/kg is roughly twice that of Q , increasing slightly with higher percentile. Phenomenologically, that is to be expected, as discussed in the next section.

TABLE 2. Actual and Fitted Data for Qualified (Q) and Unqualified (UQ) Cables

Range (kW/Kg)	Count (Q)	Count (UQ)	Q Fraction	UQ Fraction
0-10	50	20	0.633	0.526
10-20	15	8	0.190	0.211
20-30	5	2	0.063	0.053
30-40	5	2	0.063	0.053
40-50	2	1	0.025	0.026
50-60	1	2	0.013	0.053
60+	1	3	0.013	0.079
Total	79	38	1	1
Mean (kW/kg)	11.296	23.233		

Range (kW/Kg)	Count (Q)	Count (UQ)	Q Fraction	UQ Fraction
Std dev (kW/kg)	14.834	36.405		
Gamma alpha	0.580	0.407		
Gamma beta	19.480	57.046		

Fractile (%ile)	Peak HRR/Unit Mass (kW/kg)		Ratio UQ/Q
	Q	UQ	
0.005 (0.5%)	1.720E-03	9.511E-05	0.055
0.010 (1.0%)	5.685E-03	5.217E-04	0.092
0.020 (2.0%)	1.879E-02	2.861E-03	0.152
0.025 (2.5%)	2.762E-02	4.949E-03	0.179
0.050 (5.0%)	9.147E-02	2.715E-02	0.30
0.250 (25.0%)	1.537	1.438	0.94
0.500 (50.0%)	5.798	8.602	1.48
0.750 (75.0%)	15.262	29.457	1.93
0.950 (95.0%)	41.150	95.930	2.33
0.975 (97.5%)	53.054	128.161	2.42
0.980 (98.0%)	56.942	138.807	2.44
0.990 (99.0%)	69.159	172.528	2.49
0.995 (99.5%)	81.542	207.036	2.54

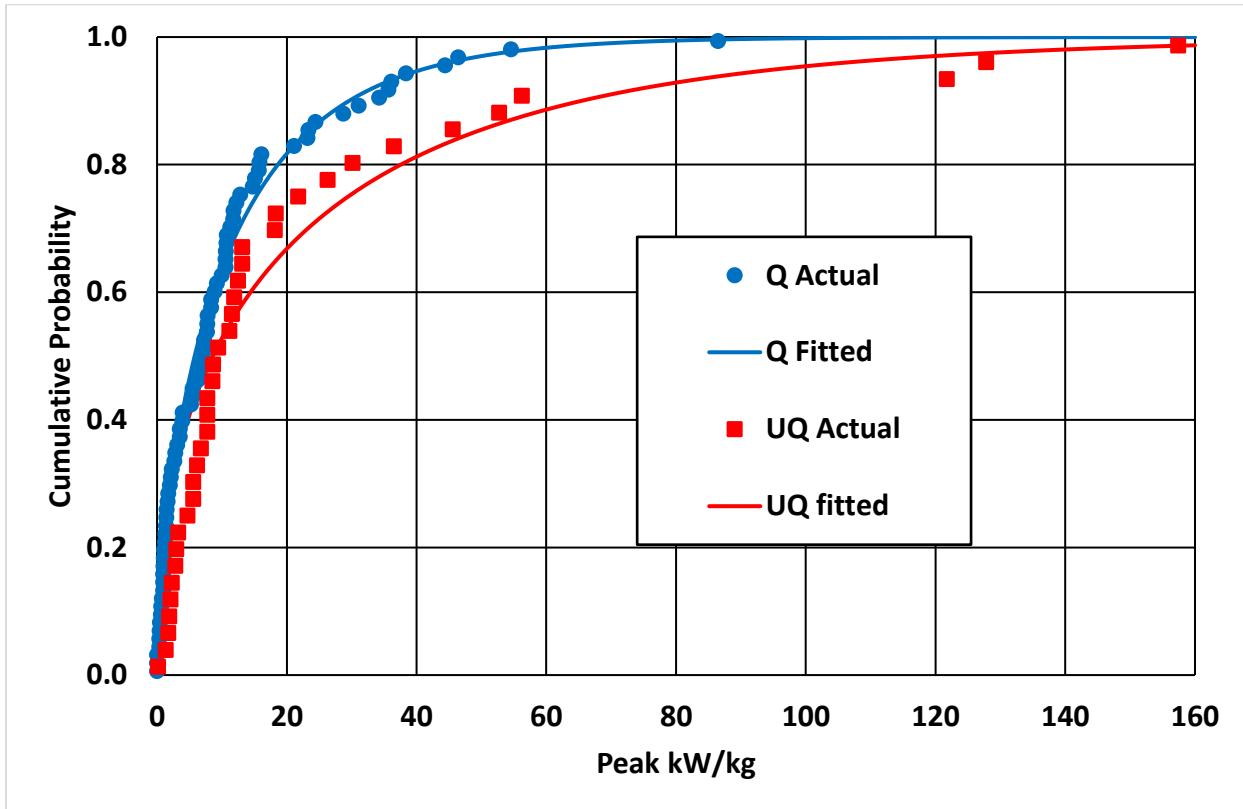


FIGURE 1. Cumulative Distribution Functions of Test Data and Gamma Distributional Fits for Both Qualified (Q) and Unqualified (UQ) Cables

3. PHENOMENOLOGY

From NUREG/CR-6850, and confirmed by NUREG/CR-7010, Volume 1 [12], the lengthwise burning rate for TP cable (assumed to correspond to UQ) is triple that for TS (assumed to correspond to Q). As a cable of cylindrical cross-section burns, one would expect the rate of fire propagation along the surface in the axial (lengthwise) direction to dominate over the rate at which fire burns “downward” (inward) in the radial direction. Therefore, the ratio of HRRs for UQ vs. Q should be roughly a factor of three, at least for individual cables with completely exposed surfaces. Given that the cables in the HELEN-FIRE tests were likely not completely exposed, the observed ratio (for a given fuel mass) of roughly a factor of two over much of the distributions seems reasonable when compared to the theoretical value of three.

Additionally, consider two electrical enclosures loaded with equal amounts of Q and UQ cable, each type of the same physical dimensions and installed in an equivalent manner. If the peak HRR occurs when the entire exposed cable surface is burning, the ratio of the peak HRRs should be approximately equal to the ratio of the HRR per unit area (q'') for each type. NUREG/CR-7010, Volume 1, recommends HRRs per unit area ranging from 100 to 200 kW/m² for TS (“qualified”) cables and from 200 to 300 kW/m² for TP cables (“unqualified”), with point estimates at 150 and 250 kW/m², respectively. Considering the ranges, the ratio $q''(UQ)/q''(Q)$ would extend from a low of 1 (lowest $q''[UQ] = 200$ divided by highest $q''[Q] = 200$) to 3 (highest $q''[UQ] = 300$ divided by lowest $q''[Q] = 100$). The ratio for the means would be 250/150 = 1.67.

Note that the HRRs per unit area recommended in NUREG/CR-7010 are based on test data obtained for cable specimens exposed to a fixed heat flux of 50 kW/m^2 . Table 3, extracted from Table 6-1 of NUREG/CR-7010, Volume 1, provides the recorded HRRs per unit area for cables tested in the cone calorimeter experiments. For the single TP cable listed, the recorded HRR per unit area at an imposed flux of 50 kW/m^2 is 184 kW/m^2 . An estimate for the ratio of peak HRRs for UQ (TP) vs. Q (TS) becomes $184/107.7 = 1.7$, using the average for the TS cables. However, UQ cables release heat more rapidly than Q cables. Therefore, the heat flux inside an enclosure filled with the former is expected to be somewhat higher than for the latter given equal loadings. Consequently, the ratio of the peak HRRs is expected to be somewhat higher than this ratio of HRR per unit area. An upper bound estimate on this effect can be obtained using the HRR per unit area for the TP cable at an imposed flux of 75 kW/m^2 , namely 266 kW/m^2 . The result is $266/107.7 = 2.5$. Given this estimated range for the ratio from 1.7 to 2.5, the roughly factor of two ratio for peak HRR per fuel mass for UQ vs. Q cables is consistent.

TABLE 3. Measured HRRs from Cone Calorimeter Experiments [12]

Cable		HRR per Unit Area (kW/m^2) [Imposed Flux = 50 kW/m^2]
Number	Type	
11	TS	90
16	TS	130
23	TS	92
43	TS	70
46	TS	61
219	TS	140
220	TS	143
367	TS	107
700	TS	136
TS Average		107.7
701	TP	$184 (@ 50 \text{ kW/m}^2)$ $266 (@ 75 \text{ kW/m}^2)$

The results for cable numbers 270 and 271 are excluded since these differed somewhat from the rest of the TS cables, being from the same manufacturer. Cable 270 was a triaxial cable with cross-linked polyethylene insulation and chloro-sulfonated polyethylene jacket. Cable 271 was a power and control cable. Although both were technically classified as TS, the observed relatively high HRR was more indicative of thermoplastic burning.

These simplistic estimates seem reasonably consistent with the analytical results from the HELEN-FIRE data showing a mean ratio of $q''(\text{UQ})/q''(\text{Q}) \approx 2$ for equal fuel mass (see Table 2). It is important to note that this analysis makes a direct comparison of the data obtained from the HELEN-FIRE tests, which typically included sufficient ventilation characteristics for the recorded HRRs, i.e., most, if not all, of the fires were not large enough to consume more oxygen than was available via enclosure leakage or openings. Further, this analysis does not attempt to extract additional effects from the data set, such as (1) oxygen-limited combustion as a result of robustly secured or sealed enclosures, or restricted or fuel-limited conditions; (2) tightly-bundled cabling. It is also worth noting that the recorded HRRs did not distinguish whether all of the available fuel was actually consumed during the test; the mass lost simply was not recorded.

3.1 Potential Effect of Door Position

Many of the tests included a change in the enclosure door position either during a single test or across multiple tests in order to observe its effect. However, in all but a few cases, the effect was either nominal or occurred after the peak HRR had already been reached; therefore, it was not possible to assess the role of ventilation from this set of data. For example, in several instances, a test was described as door-closed but there was either another large opening in the enclosure or the door was opened at some point during the test. Nonetheless, supplementary analysis of the data for peak HRR per fuel mass (combustible loading, kW/kg) at least suggests a difference based on reported door position.

When the data in Table 1 are regrouped by door position within each cable class, the results are as shown in Table 4.

TABLE 4. Ranges and Statistics for Peak HRR per Fuel Mass Based on Reported Door Position

Range (kW/kg)	Count (Q)		Count (UQ)	
	Closed	Open	Closed	Open
0-10	44	6	12	8
10-20	12	3	5	3
20-30	4	1	2	0
30-40	4	1	1	1
40-50	1	1	1	0
50-60	1	0	0	2
60+	0	1	1	2
Total	66	13	22	16
Mean (kW/kg)	9.784	18.973	17.483	31.138
Std Dev (kW/kg)	11.641	24.899	27.257	45.977

The majority of the peak HRR per fuel mass ratios remain in the lower ranges independent from door position. However, compared to the results from Table 2, there is some reduction in the mean ratios for each cable type for the closed door position (13% for Q and 25% for UQ) and increase for the open door position (94% for Q and 34% for UQ). This at least suggests a trend of up to roughly a factor of two difference in the peak HRR per fuel mass as a function of door position. Consistent with this is a comparison of two tests with equivalent cable type and fuel mass which yielded high peak HRRs, namely Test #68 (peak HRR = 216 kW, UQ cable) to Test #83 (577 kW, UQ cable). This suggests that a reduction again of roughly a factor of two in a particular peak HRR might be appropriate between an open and closed door position. To the extent that the closed door position from the HELEN-FIRE tests might serve as a surrogate if an enclosure is confirmed to be tightly sealed, a reduction of up to roughly a factor of two for peak HRR per fuel mass may be appropriate.

The method discussed in Section 4 (below) is intended to represent a baseline for analysts seeking to estimate the peak HRR for a fire in an electrical enclosure typically found in a nuclear power plant and containing primarily Q or UQ cabling. If an analyst has reason to suspect that a fire within a particular enclosure would be expected to exhibit a fuel- or oxygen-limited condition as discussed above, steps could be taken to adjust the values appropriately in order to reasonably account for these effects. Similarly, if an analyst is unable to calculate or approximate the mass of fuel within a particular enclosure by way of

physical inspection, a comparison to the catalog of images and data obtained during the HELEN-FIRE tests could serve as a surrogate or starting point for estimating the mass of available fuel.

Physical inspection so as to estimate the combustible loading within an electrical enclosure can be performed whenever an opportunity arises, or intentionally during an outage whenever the enclosures are de-energized. Enclosures, of course de-energized, may be open during power operation due to maintenance, at which time visual inspection of the contents can be made (or a photograph taken). Based on an estimate of the volume occupied by the combustibles and knowledge of the mass density, a reasonable approximation to the combustible mass is practical (within a factor of two at low loadings and even tighter at higher ones). Given the various uncertainties involved not only in fire phenomenological modeling but also in PRA itself, such estimates are well within any margin of error that would affect the PRA results. Furthermore, while there may be hundreds of electrical enclosures at a plant, they are limited to a relatively small number of different types such that obtaining mass loading estimates for a few of each type should suffice for the majority of enclosures within that type. It is instructive to note that both NUREG/CR-6850 and NUREG-2178 (other than the default condition) also require knowledge of the electrical enclosure contents when selecting the appropriate distribution for peak HRR, the former being based on number of cable bundles and the latter, other than the default condition, depending upon whether the fuel loading is “low” or “very low.” That is, at some point in time, the interior of the enclosure needs to have been visually examined (or photographed).

4. SIMULATION

To demonstrate the use of these two new peak HRR/fuel mass distributions, simple simulations for each cable class and a composite nominally consisting of an equal split were performed. Fuel mass on a per-unit (kg) basis was assumed to follow a uniform distribution ranging from 0.5 to 1.5 kg, with a mean of 1.0 kg. An on-line random number generator (<http://appincredible.com/online/random-number-generator/>) employing a Monte-Carlo, pseudo algorithm yields 10,000 random deviates for this uniform distribution as input into a Microsoft EXCEL® worksheet. This results can be simply scaled to any combustible loading via direct multiplication. For the composite case, the nominal loading of half Q and half UQ cables was assumed to vary uniformly as well, ranging from 25% Q/75% UQ to 75% Q/25% UQ, and subjected to a parallel simulation. The composite peak HRR per fuel mass when both Q and UQ cables are present is assumed to be the weighted sum of the corresponding values for each cable type. This is based on a separate analysis of the HELEN-FIRE test results for both Q and UQ cables confirming that the times to peak HRR are essentially the same for both types, i.e., around the 12 minutes recommended in NUREG/CR-6850. Therefore, the peak HRRs for both cable types should be reached at approximately the same time, such that a summation approach seems reasonable.

The results from the simulations for each of the three cases are shown in Table 5, including illustrative scaling for nominal loadings of 5 and 10 kg. Figure 2 illustrates the trends for the 5 kg case. Note that there is the additional variation for the composite case due to the simulation of the split between the two cable types such that its probability curve does not always lie between the other two cases.

TABLE 5. Simulation Results for Pairings of Fuel Mass and Cable Class

Fuel Mass	Cable Class(es)	Mean (kW)	75 th %ile (kW)	98 th %ile (kW)	Std Dev (kW)
1 kg (2.2 lb)	All Q	11.3	15.2	57.4	15.4
	All UQ	23.2	29.5	138.0	37.2
	50/50 split	17.3	23.0	79.2	21.4
5 kg (11 lb)	All Q	56.6	76.0	287.2	76.9

Fuel Mass	Cable Class(es)	Mean (kW)	75 th %ile (kW)	98 th %ile (kW)	Std Dev (kW)
10 kg (22 lb)	All UQ	116.1	147.5	690.1	186.0
	50/50 split	86.7	114.8	396.0	107.2
	All Q	113.1	152.1	574.4	153.7
	All UQ	232.3	294.9	1380.1	371.9
	50/50 split	173.4	229.6	791.9	214.3

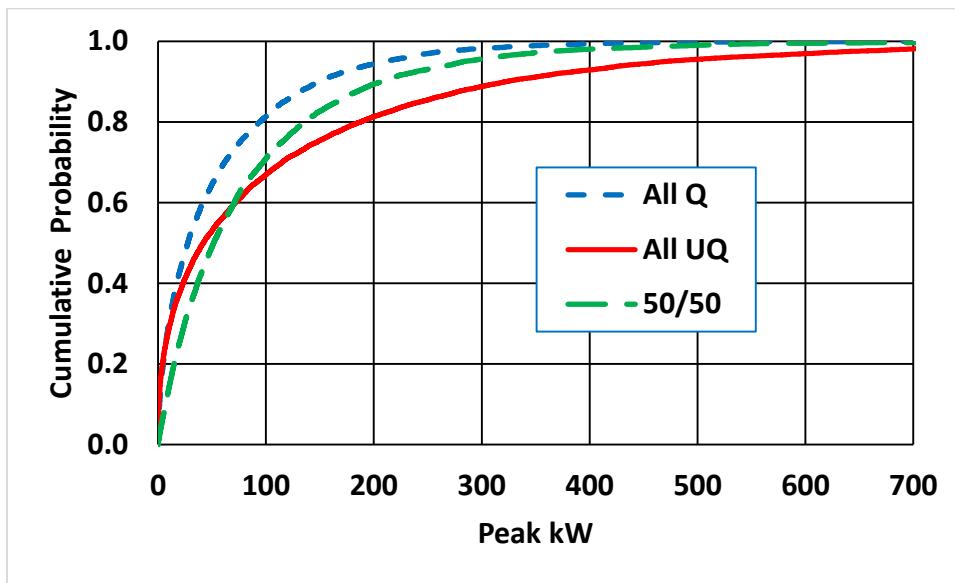


FIGURE 2. Cumulative Distribution Functions for Simulation of Peak HRR for Nominal 5-kg Fuel Mass for All Qualified (Q), All Unqualified (UQ) and Nominal 50/50 Split of Cables

The approximate 2:1 ratio for UQ vs Q HRR (given equal fuel mass) is evident for the mean and two upper percentiles. They range from a low (mean) of 11.3 kW for a nominal 1-kg loading of all Q to a maximum (98th percentile) of 1380.1 kW for a nominal 10-kg loading of all UQ, a factor of ~120. From Table G-1 of NUREG/CR-6850, a slightly tighter range is evident, from a low of 49.8 kW, the mean for a vertical cabinet with Q cable, fire limited to one bundle, to a maximum of 1002 kW, the 98th percentile or a vertical cabinet with UQ cables, open doors and fire in multiple bundles (a factor of ~20). This suggests that the 1-kg loading may be somewhat unrealistic as a minimum or that such a low loading, if not unrealistic, was possibly dismissed during the development of NUREG/CR-6850. Alignment with the HRRs from NUREG/CR-6850 remains possible for higher loadings. Considering that fires are often detected and extinguished prior to reaching their peak HRR potential, or the fuel within an enclosure is not configured in a manner conducive to supporting total consumption, it is perhaps easier to understand why plant operating experience might not reflect a common occurrence of large thermal fires.

5. CONCLUSION

There has been considerable effort on the part of the nuclear industry to *a priori* lower the default HRRs from NUREG/CR-6850 for use in bounding fire modeling and fire probabilistic risk assessment (PRA). A set of definitive tests (HELEN-FIRE) was designed to resolve this contention. Statistical analysis of the HELEN-FIRE test data, combined with phenomenological arguments supporting the results, indicate that a simplified approach to developing “realistic” or “representative” peak HRR distributions for fires in electrical enclosures is now available, requiring only that a reasonable estimate of the fuel mass

(combustible loading) and split of cable class (Q and UQ) be made prior to fire modeling. The fact that there now need be only two distributions for peak HRR per fuel mass can simplify the amount of analyses needed to support fire PRAs.

Comparison of the potential effect of using this approach vs. others, such as those from NUREG/CR-6850 or NUREG-2178, cannot be performed directly unless a specific fire scenario is examined. NUREG/CR-6850 provides five distributions for peak HRR, none of which employs a quantifiable parameter other than single vs. multiple cable bundles. NUREG-2178 provides 31 distributions based on type of electrical enclosure and enclosure volume, the only potentially quantifiable parameter other than the pseudo-quantitative designations of “default,” “low” and “very low” fuel loading options. As neither method incorporates even a rough estimate of the combustible loading inside an electrical enclosure, any direct comparison is moot. Nonetheless, it suffices to say that, if a fire model of an electrical enclosure using the approach advocated here, i.e., quantifiable based on fuel loading, were compared to that from one of the other methods, it could result in a lower, equivalent or greater peak HRR depending upon which of the categories from the other approaches was assumed vs. the actual fuel loading that our approach would employ.

As a final note, caution should still be exercised when applying these distributions to ensure that they are not extrapolated too far beyond the range on which they were based, namely fuel mass up to ~12 kg. As indicated in Table 1, no test involved a mass greater than 11.84 kg (Tests 61 and 63). Nonetheless, as this already represents a substantial loading and generates relatively high 98th percentile peak HRRs, often used for bounding estimates, it is expected that sufficient damage to electrical enclosures would already have occurred to threaten core damage in fire PRA applications, rendering extrapolation beyond this limit moot.

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APPENDIX I SENSITIVITY STUDY ON POTENTIAL EFFECT OF DOOR POSITION

As a sensitivity study on the potential effect of door position, the results from adjusting the two distributions for qualified (Q) and unqualified (UQ) cables were compared, via scaling based on the ratio of the means for the closed and open groupings for each to the means for the overall distributions, to gamma distributions fit to the closed and open groupings in the same manner as for the overall groupings. As mentioned in Section 3.1, for the closed groupings, this implied a reduction for the closed door position of 13% for Q and 25% for UQ, and increase for the open door position of 94% for Q and 34% for UQ). The results are shown in the table below. The various columns are as follows:

(U)Q (All) =	kW/kg based on primary gamma distribution for cable type
(U)Q (All) Reduced =	kW/kg based on adjusting (U)Q (All) by ratio of means of (U)Q (Closed) to (U)Q (All)
(U)Q (Closed) =	kW/kg based on gamma distribution using only closed door position data
(U)Q (All) Increased =	kW/kg based on adjusting (U)Q (All) by ratio of means of (U)Q (Open) to (U)Q (All)
(U)Q (Open) =	kW/kg based on gamma distribution using only open door position data

The largest relative variation occurs at the 50th percentile for Q in the closed groupings, where the peak HRR per fuel mass metric for the reduced overall distribution is ~12% lower than the corresponding value from the gamma distribution fit to the closed grouping (5.022 vs. 5.726 kW/kg). The largest absolute variation occurs at the 98th percentile for UQ in the open groupings, where the peak HRR per fuel mass metric for the increased overall distribution is ~10 kW/kg higher than the corresponding value from the gamma distribution fit to the open grouping (186.041 vs. 175.666 kW/kg). The remaining variations are less. By definition of the scaling, the means are the same. At the 75th percentiles, the adjusted values are practically the same as those obtained from the additional gamma fits. At the 98th percentiles, the adjusted values are slightly higher, but by no more than ~10% (Q [all] – Reduced vs. Q [Closed], 49.323 vs. 44.917 kW/kg) and the 10 kW/kg previously cited. This suggests that the simple use of just two distributions, with scaling adjustments if desired to address the potential effect of door position as a surrogate if an enclosure is confirmed to be tightly sealed, is quite practical.

TABLE A.1. Results from Sensitivity Study on Potential Effect of Door Position

Fractile (%ile)	Peak HRR per Unit Mass (kW/kg)									
	Q (All)	Q (All) - Reduced	Q (Closed)	Q (All) - Increased	Q (Open)	UQ (All)	UQ (All) - Reduced	UQ (Closed)	UQ (All) - Increased	UQ (Open)
0.50 (50.0%)	5.798	5.022	5.726	9.738	9.747	8.602	6.473	6.547	11.529	13.070
Mean	11.296	9.784	9.784	18.973	18.973	23.233	17.483	17.483	31.138	31.138
0.75 (75 %)	15.262	13.219	13.447	25.632	25.636	29.457	22.167	22.224	39.481	40.560
0.98 (98 %)	56.942	49.323	44.917	95.636	95.579	138.807	104.455	103.945	186.041	175.666
Statistics and Gamma Distributional Parameters										
Mean	11.296		9.784		21.633	23.233		17.483		29.466
Std Dev	14.834		11.641		25.911	36.405		27.257		47.085
Gamma alpha	0.580		0.707		0.697	0.407		0.411		0.392
Gamma beta	19.480		13.849		31.034	57.046		42.495		75.237

APPENDIX II ALIGNMENT WITH HRR DISTRIBUTIONS FROM RACHELLE-FIRE [10]

In the spirit of NUREG/CR-6850, the NRC Office of Nuclear Regulatory Research (RES) and Electric Power Research Institute (EPRI) developed a new set of HRR distributions from electrical enclosure fires by reviewing not only the results from HELEN-FIRE, but also those from the previous series of tests used to develop the original NUREG/CR-6850 default HRRs as well as the methods in EPRI 1022993. The results of this effort were published in NUREG-2178 (EPRI 3002005578), *Refining and Characterizing Heat Release Rates from Electrical Enclosures during Fire* (RACHELLE-FIRE) in 2015. [10] Using an elicitation process via an ad hoc working group in a manner intended to parallel that employed to develop the original HRR distributions for NUREG/CR-6850, a panel of NRC-RES, EPRI, nuclear industry and contractor staff developed 31 HRR distributions for various electrical enclosure classes and functional groups, considering three levels of fuel loading: default (presumed to be conservative), low and very low. Details and descriptions of these categories and the elicitation approach are beyond the scope of this Addendum, which examines only the results in light of the distributions based on HRR per fuel mass

developed in the main body of the paper. The goal is to determine whether the RACHELLE-FIRE distributions would predict results consistent with those from the analysis of the HELEN-FIRE data.

As shown in the Table below, RACHELLE-FIRE reports 31 HRR distributions via the gamma parameters α and β (from which the mean can be calculated as the product) and the 75th and 98th %iles (non-italicized columns). From these, the corresponding fuel masses (combustible loadings) that would generate each of these values (mean, 75th and 98th %iles) were “back-calculated” using the HRR/mass (kW/kg) for the corresponding three %iles as derived from the gamma distributions in the main body of this paper for qualified (assumed to correspond to TS) and unqualified cables (assumed to correspond to TP). (Note that “qualification” is not a function of whether or not a cable is classified as TS or TP. This is based on performance in the IEEE 383 or 1202 flame spread tests... Nonetheless, since most TS cables are “qualified” and many TP are not, this designation is applied here.) These are shown in the *italicized* columns labeled “Load.” Finally, for each row entry, the average and standard deviation of the three loads were calculated, as shown in the ***bold italicized*** last two columns.

Three trends should be noted if using the RACHELLE-FIRE distributions for predictive purposes. First, for every entry (other than 4c, where TS and TP are combined), the average load for UQ (TP) would always be lower than that for Q (TP). If one were comparing equivalent electrical enclosures where the fuel mass per enclosure class/function group would be expected to be the same regardless of the cable class, this trend suggests that (1) the HRRs for UQ (TP) cables could be systematically underestimated or (2) the HRRs for Q (TS) cables could be systematically overestimated.² One possible reason for this derives from a statement in RACHELLE-FIRE itself, whereby the panel cites that “[w]ithin a given enclosure group, the TS/QTP [qualified thermoplastic]/SIS [Switchboard Wire or XLPE-Insulated Conductor] and unqualified TP peak HRR distributions generally have the same value for the 98th percentile (with the exception of 4a – large/open/default) ... [i]n general, the working group established the same 98th percentile peak HRR value for both cable types (with the exception of large open enclosures).” However, the group also noted that “[w]ithin a given enclosure group, the 75th percentile value for the TS/QTP/SIS type is generally one-half the value assigned for the 75th percentile in the corresponding unqualified TP type,” which is consistent with the trend seen for qualified vs. unqualified cables based on HRR/mass, given equal fuel mass.³ With such constraints on the distributional range and shape, it is not surprising that a systematic variation may have occurred.

The second trend is highlighted by the shaded entries in the table. These represent cases where the standard deviation is at least 25% (and in a few cases 50%) of the value of the average, indicating wide variability in the “back-calculated” fuel masses. This likely results from the construction (or constraining) of the gamma distributions for these entries, each of which may be worth re-examination for consistency. Finally, note the minimum and maximum “back-calculated” average fuel masses, 0.45 and 8.40 kg. While the maximum is fairly consistent with the maximum examined in the main body of the paper (10 kg), the minimum is over half as low as the 1-kg minimum examined in the main body. Yet the range of postulated HRRs by the working group, from the 12-kW means for the 4b Medium and 4c Small Enclosures to the 1000-kW 98th %ile for the 4a Large Enclosure with UQ (TP) cables (default), is comparable to that from the simulated results in the main body of the paper (11.3 kW to 1380.1 kW). Therefore, one would expect the “back-calculated” fuel masses to show consistency within each category (first trend) and among the gamma distribution %iles (second trend).

² Or a combination of both.

³ Note that not only the analysis of the HELEN-FIRE data, but also the phenomenological arguments in the main body of this paper, indicate this ratio of approximately two for unqualified vs. qualified HRRs is not only maintained, but also increases, with higher percentiles of the HRR distributions, contrary to the constraint imposed in RACHELLE-FIRE.

Encl. Class/ Func. Group	Vent	Fuel	Alpha	Beta	Mean	Load-Mn (kg)	75%	98%	Load-75 (kg)	Load-98 (kg)	Avg (kg)	StDv (kg)
1 - SWGR and Load Centers	closed	Q (TS)	0.32	79	25.28	2.24	30	170	1.97	2.99	2.40	0.53
		UQ (TP)	0.99	44	43.56	1.88	60	170	2.04	1.22	1.71	0.43
2 - MCCs and Battery Chargers	closed	Q (TS)	0.36	57	20.52	1.82	25	130	1.64	2.28	1.91	0.33
		UQ (TP)	1.21	30	36.30	1.56	50	130	1.70	0.94	1.40	0.41
3 - Power Inverters	closed	Q (TS)	0.23	111	25.53	2.26	25	200	1.64	3.51	2.47	0.95
		UQ (TP)	0.52	73	37.96	1.63	50	200	1.70	1.44	1.59	0.13
4a - Large Enclosures >1.42 m ³ [50 ft ³] (default)	closed	Q (TS)	0.23	223	51.29	4.54	50	400	3.28	7.02	4.95	1.91
		UQ (TP)	0.52	145	75.40	3.25	100	400	3.39	2.88	3.17	0.26
	open	Q (TS)	0.26	365	94.90	8.40	100	700	6.55	12.29	9.08	2.93
		UQ (TP)	0.38	428	162.64	7.00	200	1000	6.79	7.20	7.00	0.21
4a - Large Enclosures >1.42 m ³ [50 ft ³] (low)	closed	Q (TS)	0.23	25	5.75	0.51	25	200	1.64	3.51	1.89	1.52
		UQ (TP)	0.52	50	26.00	1.12	50	200	1.70	1.44	1.42	0.29
	open	Q (TS)	0.26	50	13.00	1.15	50	350	3.28	6.15	3.52	2.51
		UQ (TP)	0.38	100	38.00	1.64	100	500	3.39	3.60	2.88	1.08
4a - Large Enclosures >1.42 m ³ [50 ft ³] (very low)	closed	Q (TS)	0.38	15	5.70	0.50	15	75	0.98	1.32	0.93	0.41
		UQ (TP)	0.88	25	22.00	0.95	25	75	0.85	0.54	0.78	0.21
	open	Q (TS)	0.38	15	5.70	0.50	15	75	0.98	1.32	0.93	0.41
		UQ (TP)	0.88	25	22.00	0.95	25	75	0.85	0.54	0.78	0.21
4b - Medium Enclosures ≤1.42 m ³ [50 ft ³] (default)	closed	Q (TS)	0.23	111	25.53	2.26	25	200	1.64	3.51	2.47	0.95
		UQ (TP)	0.52	73	37.96	1.63	50	200	1.70	1.44	1.59	0.13
	open	Q (TS)	0.23	182	41.86	3.70	40	325	2.62	5.71	4.01	1.57
		UQ (TP)	0.51	119	60.69	2.61	80	325	2.72	2.34	2.56	0.19
4b - Medium Enclosures ≤1.42 m ³ [50 ft ³] (low)	closed	Q (TS)	0.27	51	13.77	1.22	15	100	0.98	1.76	1.32	0.40
		UQ (TP)	0.52	36	18.72	0.81	25	100	0.85	0.72	0.79	0.07
	open	Q (TS)	0.19	92	17.48	1.55	15	150	0.98	2.63	1.72	0.84
		UQ (TP)	0.30	72	21.60	0.93	25	150	0.85	1.08	0.95	0.12
4b - Medium Enclosures ≤1.42 m ³ [50 ft ³] (very low)	closed	Q (TS)	0.88	12	10.56	0.93	15	45	0.98	0.79	0.90	0.10
		UQ (TP)	0.88	12	10.56	0.45	15	45	0.51	0.32	0.43	0.10
	open	Q (TS)	0.88	12	10.56	0.93	15	45	0.98	0.79	0.90	0.10
		UQ (TP)	0.88	12	10.56	0.45	15	45	0.51	0.32	0.43	0.10
4c - Small Enclosures >0.34 m ³ [12 ft ³]	n/a	TS/TP*	0.88	12	10.56	0.61	15	45	0.67	0.46	0.58	0.11
* For these, the average corresponding HRR/load for Q and UQ was used: 0.5 x [HRR(Q)+HRR(UQ)]						min	0.45		0.51	0.32	0.43	
						max	8.40		6.79	12.29	9.08	

Unlike the analysis done in the main body of the paper solely based on the HELEN-FIRE data, the panel reconsidered much of the data from the earlier tests that resulted in the allegedly “too conservative” HRRs in NUREG/CR-6850 and the non-endorsed method from EPRI 1022993. Data from HELEN-FIRE were considered on a selective basis, not *in toto*. Is the justification for reconsidering the non-HELEN-FIRE data, questioned in the earlier efforts, supported by the working group judgment? The degree of subjectivity that may have entered into the development of the RACHELLE-FIRE HRR distributions, given the apparent success from analyzing solely the HELEN-FIRE data, suggests re-examination of the RACHELLE-FIRE HRR distributions.

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