April 29, 2003

Mr. Robert M. Bellamy
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, Massachusetts 02360-5599

SUBJECT: PILGRIM NUCLEAR POWER STATION - NOTIFICATION OF CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION

Dear Mr. Bellamy:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region I staff will conduct a triennial fire protection baseline inspection at Pilgrim Nuclear Power Station in July 2003. The inspection team will be lead by Roy Fuhrmeister, a fire protection specialist from the NRC Region I Office. The team will be composed of personnel from NRC Region I. The inspection will be conducted in accordance with IP 71111.05, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit - week of June 8, 2003
- Weeks of onsite inspection - July 14-18 and July 28-August 1

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the Pilgrim Nuclear Power Station fire protection programs, fire protection features, and post-fire safe shutdown capabilities and plant layout, and, as necessary, obtain plant specific site access training and badging for unescorted site access. A list of the types of documents the team may be interested in reviewing, and possibly obtaining, are listed in Enclosure 1. The team leader will contact you with specific document requests.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access (including radiation protection training, security, safety and fitness for duty requirements); and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Pilgrim Nuclear Generating Station fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents

which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems and features, and the Pilgrim Nuclear Power Station fire protection program and its implementation.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Roy Fuhrmeister, the team leader, in the Region I Office at 610-337-5059.

Sincerely,

/RA/

James C. Linville, Chief
Electrical Engineering Branch

Docket No. 50-293
License No. DPR-35

Enclosure: 1) Reactor Fire Protection program Supporting Documentation
2) Inspection Criteria for Fire Protection Manual actions

cc w/encl: M. Krupa, Director, Nuclear Safety & Licensing
W. Riggs, Director, Nuclear Assessment Group
D. Tarantino, Nuclear Information Manager
B. Ford, Regulatory Affairs Department Manager
J. Fulton, Assistant General Counsel
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
The Honorable Therese Murray
The Honorable Vincent deMacedo
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Chairman, Nuclear Matters Committee
Plymouth Civil Defense Director
D. O'Connor, Massachusetts Secretary of Energy Resources
J. Miller, Senior Issues Manager
Office of the Commissioner, Massachusetts Department of
Environmental Protection
Office of the Attorney General, Commonwealth of Massachusetts
Chairman, Citizens Urging Responsible Energy
S. McGrail, Director, Commonwealth of Massachusetts, SLO Designee
Electric Power Division
Commonwealth of Massachusetts, Secretary of Public Safety
R. Shadis, New England Coalition Staff
D. A. Craig, FEMA, Region I All EP Exercise & EP Inspection Reports)

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NAME	RFuhrmeister		JLinville						
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ENCLOSURE 1

Reactor Fire Protection Program Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. The current version of the Fire Protection Program and Fire Hazards Analysis.

2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).

3. Fire brigade training program and pre-fire plans.

4. Post-fire safe shutdown systems and separation analysis.

5. Post-fire alternative shutdown analysis.

6. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.

7. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.

8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.

9. Plant layout drawings which identify the general location of the post-fire emergency lighting units.

10. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.

11. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.

12. Maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.

13. A sample of significant fire protection and post-fire safe shutdown related design change packages and Generic Letter 86-10 evaluations.

14. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.

15. Temporary modification procedures.

16. Organization charts of site personnel down to the level of fire protection staff personnel.

17. If applicable, layout/arrangement drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.

18. A listing of the SERs which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.

19. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.

20. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.

21. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.

22. The three most recent fire protection QA audits and/or fire protection self-assessments.

23. Recent QA surveillances of fire protection activities.

24. A listing of open and closed fire protection condition reports (problem reports/NCRs/EARs/problem identification and resolution reports).

25. Listing of plant fire protection licensing basis documents.

26. A listing of the NFPA code versions committed to (NFPA codes of record).

27. A listing of plant deviations from code commitments.

28. Actual copies of Generic Letter 86-10 evaluations.

END

INSPECTION CRITERIA FOR FIRE PROTECTION MANUAL ACTIONS

BACKGROUND

Licensees not in compliance with 10 CFR 50 Appendix R, Section III.G.2 require fire protection of safe shutdown capability. Section III.G.2 requires that circuits that could prevent the operation or cause misoperation of redundant trains of safe shutdown equipment have one of the specified fire protection features. Manual actions to respond to misoperations are not listed as an acceptable method for satisfying this requirement. However, the NRC has previously accepted plant-specific manual actions in formal exemption/deviation requests and in safety evaluation reports (SERs).

Based on inspection results and industry comments the NRC determined that licensees have, without request for exemption/deviation from the code, implemented manual actions where the specified requirements of Section III.G.2 cannot be met. The staff concluded that rulemaking would be required to allow licensees committed to Appendix R to substitute manual actions in lieu of Section III.G2 compliance. For an interim period, while rulemaking is in progress, the staff determined that acceptance criteria can be developed which would facilitate evaluations of certain manual actions. Authority to approve a licensee methodology that does not meet NRC regulations is not delegated to the inspectors. However, inspectors will ensure that plant specific manual actions meet the guidelines of this enclosure.

APPLICABILITY

This guidance is provided for the assessment of manual actions implemented in conjunction with licensee commitment to Section III.G.2.

Verify that the licensee is committed to meet the requirements of Section III.G.2. Determine whether the requirements are met with or without the use of manual actions. If manual action are not invoked this guidance is not applicable.

If manual actions were previously approved by the staff and exemption/deviation has been issued, verify that the licensee continues to meet the basis of the staff action.

INSPECTION PLANNING

See LEVEL OF EFFORT section at the beginning of the main procedure.

DIAGNOSTIC INSTRUMENTATION

Determine whether adequate diagnostic instrumentation, unaffected by the postulated fire, is provided for the operator to detect the specific spurious operation that occurred. Some licensees may have protected only those circuits specified in Information Notice 84-09. Additional instrumentation may be needed to properly assess a spurious operation. Annunciators, indicating lights, pressure gages, and flow indicators are among those instruments typically not protected from the effects of a fire. Instrumentation should also be available to verify that the manual action accomplished the intended objective.

ENVIRONMENTAL CONSIDERATIONS

Review environmental conditions the operator may encounter while accessing and performing the manual action. Radiation levels should not exceed normal 10 CFR Part 20 limits. Emergency lighting should be provided as required in Appendix R, Section III.J or by the licensee's approved fire protection program. Temperature and humidity conditions should be reviewed to ensure that temperature and humidity do not affect the capability to perform the manual action. Fire effects should be reviewed to ensure that smoke and toxic gases from the fire do not affect the capability to perform the manual action.

STAFFING

Review licensee shift staffing to determine whether that adequate qualified personnel are available to perform the required manual actions and to safely operate the reactor.

COMMUNICATIONS

If manual action coordination with other plant operations is required, then communications capability must be protected from effects of a postulated fire.

SPECIAL TOOLS

If special tools are required, determine whether tools are dedicated and available from accessible nearby location.

TRAINING

Determine whether operator training on the manual actions and the procedure is adequate and current.

ACCESSABILITY

Review accessability. If a ladder or other special access equipment is needed, verify the availability. Determine whether an operator can reach the required location without personal hazard.

PROCEDURES

Review procedural guidance to ensure that it is adequate and contained in an emergency procedure. Operators should not rely on having time to study normal plant procedures to find a method of operating plant equipment that is seldom used.

VERIFICATION AND VALIDATION

Determine whether the manual actions have been verified and validated by plant walkdowns using the current procedure. Ensure that the licensee has adequately evaluated the capability of operators to perform the manual action in the time available before the plant will be placed in an unrecoverable condition.

END