

February 3, 2004

LICENSEES: Carolina Power & Light Company and Florida Power Corporation
(Also doing business as Progress Energy)

FACILITIES: Brunswick, Crystal River, Shearon Harris, H. B. Robinson

SUBJECT: SUMMARY OF THE JANUARY 7, 2004, MEETING WITH PROGRESS
ENERGY TO DISCUSS FIRE PROTECTION INITIATIVES

On January 7, 2004, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting at the NRC Headquarters in Rockville, Maryland with Progress Energy (PE). PE's purpose for this meeting was to communicate their current corporate plans with regard to ongoing fire protection (FP) issues. This meeting was classified as a Category 1 meeting, which provided an opportunity for the public to communicate with the NRC after the business portion, but before the meeting was adjourned. The list of attendees is attached. The meeting handouts provided by PE have been placed in ADAMS.

The NRC staff discussed the status of ongoing fire protection rulemaking and the most recent NRC staff efforts in the area of associated circuits. PE outlined several goals related to PE's corporate FP Initiative. These goals were to maintain compliance to ensure an adequate level of safety is maintained, to institute a consistent safe shutdown (SSD) methodology across the PE fleet, and to prioritize PE FP resources from a safety-significance perspective. PE indicated that validations of the SSD analyses for Harris and Robinson had begun in 2003 and were intended to begin for the Brunswick and Crystal River units in 2004. The validations were expected to take between 18-24 months to complete.

In the area of fire-induced cable failures, PE stated that they integrated safety significance as well as both available regulatory and industry guidance to develop a significance determination position for validation of their SSD analyses. The NRC staff questioned whether a draft Regulatory Issues Summary (RIS) published by the NRC staff in 2003 was used in the PE significance determination scheme. PE stated that the draft RIS was being used and preliminarily the validation has identified additional cables that should be added to the SSD analysis for Harris. Although the new scheme is more detailed, no significant issues have been identified to date. The significance determination scheme separates the cables into three "bins" identified as high, moderate, and low. The most risk significant cables are analyzed in the SSD analysis.

The NRC staff questioned the consistency in application of the binning and how PE defined the high significance determination. PE indicated that the methodology would be consistently applied and that the high significance cables were those that may impede the ability to achieve hot shutdown within one hour. NRC staff also questioned on the treatment of cables that fell into the other two bins. PE stated their intention was to wait for final NRC resolution before addressing these items. The NRC staff indicated that any nonconformances to the NRC regulations should be properly identified, tracked, and corrected consistent with existing requirements. PE indicated that the items would be appropriately and consistently handled since the same team was performing all the validations. The NRC staff also questioned the

flexibility of the program to deal with postulating more than two cable failures (currently one of the items in the RIS requiring research). Based on the validation efforts, PE indicated that they should be able to handle assessing more than two cable failures if future NRC efforts indicated the necessity. The NRC staff asked if a summary could be made available of the major unexpected items identified. PE replied that to date the validation effort has not progressed far enough to identify any high significance items, but that PE would communicate any information they could with respect to any major unexpected items identified.

In the area of 10 CFR Part 50, Appendix R, III.G.2 manual actions, PE discussed a corporate policy revision to the methodology consistent with the draft language in the III.G.2 rulemaking. The results of the revision has PE reviewing their fire areas. PE identified several challenges in this area that included the timing of the pending NRC interim feasibility criteria and enforcement discretion. The timing was especially significant due to outstanding nonconformances in the PE corrective action program. PE indicated that exemptions for the nonconformances were in the planning stages. The NRC staff indicated an awareness of the sensitivity for the industry with the timing of the criteria and enforcement discretion and that the NRC staff was progressing towards issuance after resolution of various comments received regarding the draft language.

Another topic discussed included PE's potential use of fire-rated cable as one hardware option along with raceway wrap and the rerouting of conventional cable to address SSD separation issues. PE discussed where the particular fire-rated cable under consideration had been used at other nuclear facilities as well as the qualification and their use of a non-nuclear qualification standard for testing. The NRC staff questioned the test parameters proposed regarding bounding the cable sizes and ratings and from a big picture standpoint whether the testing would bound existing plant configurations. Additionally, the NRC staff provided observations regarding the test plan proposed acceptance criteria and referred PE to a more complete summary of the NRC staff's concerns with the test methodology proposed.

The NRC staff found the meeting highly beneficial and found PE's efforts proactive and ahead of the industry in many areas. PE indicated their appreciation of the NRC staff's comments and the opportunity to present their ongoing efforts to improve their FP programs.

/RA by C. P. Patel for/

Eva A. Brown, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-302, 50-261, and 50-400

Attachment: Attendance List

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Package: ML040340495

Meeting Handouts: ML040350505

Notice: ML033560552

ADAMS Accession No. ML040340478

*See previous concurrence

NRC-001

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ENERGY TO DISCUSS FIRE PROTECTION INITIATIVES

Dated: February 3, 2004

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