

RIV STATUS OF FIRE PROTECTION INSPECTIONS

Completed first round of FP Triennial Inspections in 2002

Completed second round of FP Triennials at 3 sites to date (DC, CGS, PV)

Early Focus/Findings (January 2000 - June 2001)

- Separation of redundant trains in the same fire area (App R, III.G.2)
- Redundant SSD equipment was free of fire damage (App R, III.G.2)
- Fire barriers, fire doors, and fire rated penetrations
- Fire protection features (detection, suppression)

Later Focus/Findings (June 2001 to Present, Incorporated Lessons-learned)

- Manual actions in lieu of ensuring SSD equipment is free of fire damage (III.G.2)
- Alternative shutdown - timing of manual actions
- Emergency communications
- Emergency lighting
- Fire barriers, doors, penetrations

Findings In Second Round of Triennials

- Select less risk significant areas - expect the issues to be of less risk significance
- URI for manual actions in III.G.2 areas (pending licensing basis review)
- URI for ASD timing issues (pending licensee actions)
- APV for associated circuits

Manual Actions Findings (manual actions in lieu of meeting III.G.2 requirements)

- Early findings were processed as non-compliances using the SDP process.
- Later findings were processed iaw IP 71111.05T guidance (Green NCV if manual actions are reasonable and feasible)

Alternative Shutdown Findings (III.G.3)

- Findings associated with the ability of operators to perform actions outside the control room within analyzed time constraints.
- *RIV first ID'd*
Findings associated with the timing of ASD manual actions have been identified at other regions [REDACTED]
- Findings associated with the adequacy and quality of ASD procedures.

*First ID'd in RIV
we have the most findings
This was discussed
in the monthly call.*

E.V.S

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 5
FOIA- 2003-358

IS-2

Associated Circuits/Multiple Hot Shorts/Mechanistic Damage Issues

- EGM 98-006 put these issues on hold
- For these issues, we have opened 4 URIs and 2 APVs
- Guidance coming in early Sept for NRC and in Oct for industry and public
 - * mechanistic damage and multiple hot shorts issues?
 - * definition of associated circuits vs. required circuits?
- Begin inspections using the new guidance early next year?

*Did we attend
public workshop
in Feb?*

Compensatory Measures

- RIV reviews comp measures in place at the time of the inspections.
- RIV inspectors perform walkdowns to verify that comp measures are in place, if necessary.
- To date no findings of significance have been identified.
- The licensee's FPP defines comp measures. Licensee's may change their FPP as long as it doesn't affect their ability to achieve and maintain SSD. .

Licensing Basis

- Difficult and time-consuming for both the licensee and NRC to assemble the licensing basis. SERs not always clear wrt what exactly was reviewed and approved.
- Understanding of the LB is time-consuming and sometimes controversial, requiring the region to consult with OGC.
- At least one other region saves/files the LB of each plant during the first round, so that this does not need to be performed from scratch during subsequent triennials.

Would like to see

- Resolution of Heymc issue
- Definition of adversely affect (re: license condition that states that licensee's may make changes to their FPP as long as they do not adversely affect their ability to achieve and maintain SSD.)
- Guidance on licensing basis - particularly if licensee submittals can be considered in determining the LB. Usually they are not listed as part of the FPP in the license condition.