



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

April 29, 2004

Carolina Power & Light Company
ATTN: Mr. J. W. Moyer
Vice President
H. B. Robinson Steam Electric Plant Unit 2
3581 West Entrance Road
Hartsville, SC 29550

**SUBJECT: NOTIFICATION OF TRIENNIAL FIRE PROTECTION BASELINE INSPECTION
(NRC INSPECTION REPORT 05000261/2004006)**

Dear Mr. Moyer:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region II staff will conduct a triennial fire protection baseline inspection at the H. B. Robinson Steam Electric Plant in August, 2004. The inspection team will be led by Mr. R. Schin, Senior Reactor Inspector, of the Region II Office. The team will be composed of personnel from the NRC Region II Office and a contracted national laboratory. The inspection will be conducted in accordance with the NRC's baseline fire protection inspection procedure 71111.05.

The inspection objective will be to evaluate your fire protection program implementation with emphasis on post-fire safe shutdown capability and the fire protection features provided to ensure at least one post-fire safe shutdown success path is maintained free of fire damage. The inspection team will focus their review on the separation of the systems and equipment necessary to achieve and maintain safe shutdown and fire protection features of selected fire areas.

On April 28, 2004, during a telephone conversation with Mr. C. Baucom, Licensing Supervisor, our respective staffs confirmed arrangements for a three-day information gathering onsite visit and a two-week onsite inspection. The schedule for the inspection is as follows:

- Information gathering onsite visit - Week of July 26-30, 2004
- Week 1 of onsite inspection - August 16-20, 2004
- Week 2 of onsite inspection - August 30-September 3, 2004

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, and to become familiar with the H.B. Robinson Steam Electric Plant fire protection program, fire protection features, post-fire safe shutdown capabilities and plant layout. The types of documents the team will be interested in reviewing, and possibly obtaining, are listed in the Enclosure. Please contact Mr. R. Schin prior to preparing copies of the materials listed in the Enclosure. The inspection team will try to minimize your administrative burden by specifically identifying those documents required for inspection preparation.

During the information gathering visit, the team will also discuss the following inspection support administrative details - office space, specific documents to be made available to the team in its office space, 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 inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the H. B. Robinson Steam Electric Plant fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for its 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 H. B. Robinson Steam Electric Plant 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 Mr. R. Schin at (404) 562-4629, or me at (404) 562-4605.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Charles R. Ogle, Chief
Engineering Branch 1
Division of Reactor Safety

Docket Nos.: 05000261
License Nos.: DPR-23

Enclosure: Triennial Fire Protection Inspection Support Documentation

cc w/encl: (See page 3)

cc w/encl:
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SIGNATURE	RA	RA	RA			
NAME	RSchin	KO'Donohue	PFredrickson			
DATE	04/28 /2004	04/29 /2004	04/29 /2004			
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO
PUBLIC DOCUMENT	YES NO					

Triennial Fire Protection Inspection Support 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. The current version of these documents is expected unless specified otherwise. Electronic media is preferred, if readily available. (The preferred file format is searchable “.pdf” files on CDROM. The CDROM should be indexed and hyperlinked to facilitate ease of use. Please provide 5 copies of each CDROM submitted.) Information in “lists” should contain enough information to be easily understood by someone who has a knowledge of the technology. The lead inspector will discuss specific information needs with the licensee staff and may request additional documents.

1. The Fire Protection Program document and the Fire Hazards Analysis.
2. The fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
3. The fire brigade training program document and the pre-fire plans for the selected fire areas/zones (to be determined during information gathering visit).
4. The post-fire safe shutdown analysis, including system and separation analyses.
5. The alternative shutdown analysis.
6. Piping and instrumentation (flow) diagrams for the fire suppression systems.
7. Piping and instrumentation (flow) diagrams for the systems and components used to achieve and maintain hot standby, and cold shutdown, for fires outside the control room.
8. Piping and instrumentation (flow) diagrams for the systems and components used to achieve and maintain hot standby, and cold shutdown, in areas requiring alternative shutdown capability.
9. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
10. Plant layout drawings which identify plant fire area and/or fire zone delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment for the selected fire areas/zones (to be determined during information gathering visit).
11. Plant layout drawings which identify the general location of the post-fire emergency lighting units.
12. Plant operating procedures used to, and describing, shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room.

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13. Plant operating procedures used to implement the alternative shutdown capability from outside the control room with a fire in either the control or cable spreading room (or any other alternative shutdown area).
14. Maintenance and surveillance testing procedures for alternative shutdown capability (including Appendix R emergency lights and communication systems) and fire barriers, detectors, fire pumps and fire suppression systems.
15. Calculations and/or justifications that verify fuse/breaker coordination for the selected fire areas/zones (to be determined during information gathering visit) that are fed off the same electrical buses as components in the protected train. Also, a list of the maintenance procedures used to routinely verify fuse/breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
16. A list of the significant fire protection and post-fire safe shutdown design change descriptions (including their associated 10 CFR 50.59 evaluations) and Generic Letter (GL) 86-10 evaluations.
17. A list of the protection methodologies (as identified in 10 CFR Part 50, Appendix R, Section III.G) used to achieve regulatory compliance for the selected fire areas/zones (to be determined during information gathering visit). That is, please specify whether 3-hour rated fire barriers (Section III.G.2.a), 20-foot separation along with detection and suppression (Section III.G.2.b), 1-hour rated fire barriers with detection and suppression (Section III.G.2.c), or alternative shutdown capability (Section III.G.3) is used for the selected fire areas/zones.
18. Procedures or instructions that govern the implementation of plant modifications, temporary modifications, maintenance, and special operations, and their impact on fire protection.
19. Organization chart(s) of site personnel down to the level of the fire protection staff.
20. Procedures or instructions that control the configuration of the fire protection program, features, and post-fire safe shutdown methodology and system design.
21. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations (i.e., a listing of the NFPA code editions committed to (Code of Record)).
22. The three most recent fire protection QA audits and/or fire protection self-assessments.
23. A list of open and closed fire protection problem identification and resolution reports [also known as action reports/condition reports/problem reports/problem investigation reports/NCRs/EARs] associated with fire protection or Appendix R safe shutdown for the past three years.

24. A list of plant fire protection licensing basis documents (i.e., a list of the SERs and change evaluations which form the licensing basis for the facility's post-fire safe shutdown configuration).
25. A list of fire protection or Appendix R calculations.
26. A list of fire impairments identified during the previous year.
27. A list of abbreviations/designators for plant systems.