From: Charles R. Ogle / ETI
To: Wiseman, Gerald
Date: 12/1/03 3:41PM
Subject: MY REVIEW OF YOUR BF INPUT

Gerry, attached is a document that compares what you submitted to what we put out in the Brown's Ferry report.

Comments:
1) Please try to use inspectors as opposed to team.
2) In regards to your proposed URI: In general, I'd like to process issues as they come up as opposed to generating additional URIs. In addition, I found the description section of your submittal to be lacking. Please refer to what was put out in the final report. I believe the final version better describes the finding. Also, I don't think that your enforcement section really describes what the enforcement issue was. In general, I think that the writeup for a URI should be more complete. If all we are waiting on is the SDP, everything else should be described as if the final violation was being issued.
3) It wasn't really clear from the writeup on the URI what work was required on our part. Try to be more specific-determine regulatory significance, complete the SDP, whatever we are working on.

Overall, I thought this was a fully successful writeup. Please see me if you have any questions.

Thanks.

A-30

~~A. INSPECTION REPORT INPUT~~

~~1. REACTOR SAFETY~~
~~Cornerstones: Initiating Events, Mitigating Systems~~

~~A. Inspector Identified Findings~~

~~NONE~~

.02 Fire Protection of Safe Shutdown ~~(SSD)~~ Capability~~-~~

a. Inspection Scope~~-~~

For the selected fire areas, the inspectors~~team~~ evaluated the frequency of fires or the potential for fires, the combustible fire load characteristics and potential fire severity, the separation of systems necessary to achieve SSD, and the separation of electrical components and circuits to ensure that at least one SSD path was free of fire damage. The inspectors~~team~~ also reviewed the Fire Hazards Analysis (FHA) to verify the fire loading used by the licensee to determine the fire-resistive~~fire resistive~~ rating of the fire protection barriers and features. The inspectors~~team~~ also inspected the fire protection barriers and features to confirm they were installed in accordance with the codes of record to satisfy the applicable separation and design requirements of 10 CFR 50, Appendix R, Section III.G, and commitments to BTP CMEB 9.5-1. The inspectors~~Branch Technical Position (BTP) Chemical and Material Engineering Branch (CMEB) 9.5-1. The team~~ reviewed the following documents, which established the controls and practices to prevent fires and to control the storage of permanent and transient combustible materials and ignition sources, to verify that the objectives established by the NRC-approved ~~Fire Protection Program (FPP)~~ were satisfied:

- Fire Protection Report (FPR) Volume 1, Fire Protection Plan
- FPR~~Fire Protection Report~~ Volume 2, Section I-D, Smoking Restrictions
- TVAN Standard Programs and Processes Procedure SPP-10.10, Control of Transient Combustibles
- TVAN Standard Programs and Processes Procedure SPP-10.11, Control of Ignition Sources (Hot Work)
- Electrical Preventive Instruction EPI-0--000-MCC001, Maintenance and Inspection of 480 V~~Volt~~ AC and 250 V~~250V~~ DC Motor Control Centers

The inspectors~~team~~ toured the selected ~~plant~~ fire areas to observe whether the licensee had properly evaluated in-situ combustible fire loads and limited transient fire hazards in a manner consistent with the fire prevention and combustible hazards control procedures. ~~-~~In addition, the inspectors~~team~~ reviewed selected weekly fire safety inspection reports and fire brigade response and emergency/incident reports for 2002 and 2003~~,~~ to assess the effectiveness of the fire prevention program.

The fire brigade is a dedicated group which is independent of the control room staff. The inspectors~~team~~ reviewed fire brigade response, fire brigade qualification training, and drill program procedures; fire brigade drill critiques; and drill records for the brigade shifts from January 2001 to~~-~~ May 2003. The reviews were performed to determine

whether fire brigade drills had been conducted in high fire risk plant areas and whether fire brigade personnel qualifications, drill response, and performance met the requirements of the licensee's approved FPP.

The inspectors~~team performed~~ walked down ~~downs of~~ the fire brigade house and examined the response vehicle to assess the condition of fire fighting and smoke control equipment. Fire brigade personal protective equipment was examined~~reviewed~~ to evaluate equipment accessibility and functionality. Additionally, the inspectors~~team~~ observed whether emergency exit lighting was provided for personnel evacuation pathways to the outside exits as identified in the National Fire Protection Association (NFPA) 101, Life Safety Code, and ~~the~~ Occupational Safety and Health Administration (OSHA) Part 1910, Occupational Safety and Health Standards. This review also included examination of whether backup emergency lighting was provided for access pathways to and within the fire brigade house and equipment storage areas in support of fire brigade operations should power fail during a fire emergency. The fire brigade self-contained breathing apparatuses ~~(SCBAs)~~ were evaluated~~reviewed~~ for adequacy as well as the availability, and refill capability, of supplemental breathing air tanks ~~and their refill capability~~.

The inspectors~~team~~ reviewed fire fighting pre-fire plans for the selected fire areas to determine if appropriate information was provided to fire brigade members and plant operators to facilitate suppression of a fire ~~that could impact SSD~~. Team members also walked down the selected fire areas to compare the associated pre-fire plans and drawings with as-built plant conditions. This was done to verify that fire fighting pre-fire plans and drawings were consistent with the fire protection features and potential fire conditions described in the plant FHA.–

The inspectors analyzed~~team reviewed~~ flow diagrams, circuit wiring diagrams and engineering calculations associated with the ~~1A and 1B battery rooms'~~ heating, ventilation, and air conditioning (HVAC) systems of the 2A and 2B Emergency Battery and Shutdown Board Rooms. This review was done to verify that systems used to place the plant in a SSD condition would not be impaired by a battery room fire started as a result of~~accomplish SSD would not be inhibited by a fire in the battery rooms caused by~~ hydrogen gas buildup (from~~due to inoperable~~ ventilation system problems)~~supply and exhaust fans~~. The inspectors~~team~~ also reviewed the annunciator response procedure for loss of ventilation in the battery rooms to affirm~~verify~~ that actions were specified that would~~to~~ ensure ~~that~~ hydrogen gas concentrations generated by the station batteries would be maintained~~remained~~ below explosive limits. The components and equipment included in this review are listed in the attachment.

The inspectors

~~The team~~ reviewed the licensee's methodology for meeting the requirements of 10 CFR 50.48; and the bases for the NRC's acceptance of this methodology as documented in NRC SERs~~safety evaluation reports~~. In addition, the

Inspectorsteam reviewed plantlicense documentation, such as the UFSARfinal safety analysis report, submittals made to the NRC by the licensee in support of the NRC's review of their FPPfire protection program, and deviations from NRC regulations to verify that the licensee met license commitments. Additionally, design control procedures were reviewed to verify that plant changes were adequately reviewed for the potential impact on the FPP, SSD equipment, and procedures as required by the Browns Ferry Units 2 and Unit 3 oOperating lLicense conditionsCondition 3.C.(14). The inspectors reviewed the criteria in plantlicensee procedures SPP-7.1, On Line Work Management, and SPP-9.3, Plant Modifications and Engineering Change Control, to determine ifverify that risk significant plant modifications; were developed, reviewed, and approved per the procedure requirements.

b. Findings

No findings of significance were identified.

.067 CommunicationsEmergency Lighting

a. Inspection Scope

The Inspectorsteam reviewed the design and operation of, and examined the manufacturer's data sheets for the direct current (DC) self-contained, battery powered emergency lighting units (ELUs) required to support plant personnel in the performance of SSD functions to verify it was adequate to support the performance of manual actions required to achieve and maintain SSD conditions, and for illuminating access and egress routes to the areas where manual actions are required. The team checked if these battery power supplies were rated with at least an 8-hour capacity as required by Section III.J of Appendix R. During plant walk downs of selected areas where operators performed local manual actions, the team inspected area ELUs for operability and checked the aiming of lamp heads to determine if sufficient illumination was available to adequately illuminate the SSD equipment, the equipment identification tags, and the access and egress routes thereto, so that operators would be able to perform the actions without needing to use flashlights. The team also reviewed completed surveillance and maintenance procedures and test records to ensure that the licensee properly maintained the lighting.

b. Findings

No findings of significance were identified.

.06 Communications for Performance of SSD Capability

a. Inspection Scope

~~The team~~ reviewed plant communication capabilities to evaluate the availability of the communication systems to support plant personnel in the performance of manual operator actions for shutdown, fire event notification, and fire brigade fire fighting duties. The inspectors~~team~~ reviewed the licensee's communications systems' separation analysis to verify ~~that~~ site portable radios~~,~~ and sound-powered phone systems were designed per~~consistent with~~ the licensing basis and would be available during fire response activities. The inspectors~~team~~ also reviewed the fire brigade drill critiques to assess proper operation and effectiveness of the fire brigade command post radio communications ~~during fire drills~~. In addition, the inspectors~~team~~ reviewed the fire brigade radio communications systems to assess whether the ~~licensee's~~ radio channel features would continue to operate if~~should~~ the radio repeaters for the primary communications system became~~be~~ unavailable.

b. Findings

No findings of significance were identified.

.07 ~~9~~ Emergency Lighting~~Fire Barriers and Fire Area/Zone/Room Penetration Seals~~

a. Inspection Scope

The inspectors reviewed the design, operation, and manufacturer's data sheets for the direct current (DC) self-contained battery powered emergency lighting units (ELUs). The inspectors evaluated the capability of the ELUs to support plant personnel in the performance of SSD functions, including local manual operator actions, and for illuminating access and egress routes to the areas where those manual actions would be performed. The inspectors checked that these battery power supplies were rated with at least an 8-hour capacity, as required by Section III.J of 10 CFR 50, Appendix R. During inspector walk downs of the plant areas where operators performed local manual actions, the inspectors inspected area ELUs for proper operation and checked the aiming of lamp heads to determine if sufficient illumination would be available to adequately illuminate the SSD equipment, the equipment identification tags, and the access and egress routes thereto, so that operators would be able to perform the actions without needing to use flashlights. The inspectors also~~team reviewed the selected fire areas to evaluate the adequacy of the fire resistance of fire area barrier enclosure walls, ceilings, floors, fire barrier mechanical and electrical penetration seals, fire doors, and fire dampers to ensure that at least one train of SSD equipment would be maintained free of fire damage. The team selected several fire barrier features for detailed evaluation and inspection to verify proper installation and qualification. The team walked down the selected fire areas to observe the material condition and configuration of the installed fire barrier features, as well as, reviewed construction details and supporting fire endurance tests for the installed fire barrier features to verify the as-built configurations were qualified by appropriate fire endurance tests. The team also reviewed the FHA to verify the fire loading used by the licensee to determine the fire resistance rating of the fire barrier enclosures. The team also compared the penetration seal ratings with the ratings of the barrier enclosures in which they were installed. The team reviewed the installation instructions for fire doors, the design details for mechanical and electrical penetrations, the penetration seal database, Generic Letter 86-10 evaluations, and the fire protection penetration seal deviation analysis for the~~

~~technical basis of fire barrier penetration seals to verify that the fire barrier installations met design requirements and license commitments. In addition, the team~~ reviewed completed surveillance and maintenance procedures and test records to ensure that the licensee properly maintained the lighting equipment~~for selected fire barrier features to verify the fire barriers were being adequately maintained.~~

~~The team reviewed abnormal operating fire procedures, selected fire fighting pre-plans, fire damper location and detail drawings, and heating ventilation and air conditioning system drawings to verify that access to shutdown equipment and selected operator manual actions would not be inhibited by smoke migration from one area to adjacent plant areas used to accomplish SSD.~~

b. Findings

No findings of significance were identified.

.10 Fire Protection Systems, Features, and Equipment

a. Inspection Scope

The ~~inspectorsteam~~ reviewed flow diagrams, cable routing information, operational valve lineup procedures, and system availability studies, associated with the fire pumps and fire protection water supply system. The ~~inspectorsreview~~ evaluated ~~whether~~ the common fire protection water delivery and supply components to determine if they could be damaged or inhibited by fire-induced failures of electrical power supplies or control circuits. Using operating and test procedures, the ~~inspectorsteam~~ toured the electric motor-driven fire pumps and diesel-driven fire pump to observe the system material condition, consistency of as-built configurations with engineering drawings, and determine correct system controls and valve lineups. Additionally, the ~~inspectorsteam~~ reviewed periodic test procedures for the fire pumps to assess whether the surveillance test program was sufficient to verify proper operation of the fire protection water supply system in accordance with the system operating requirements specified in Sections 9.3 and ~~93/~~9.4 of the FPR.

The ~~inspectorsteam~~ reviewed the adequacy of the design, installation, and operation of the automatic detection and alarm system for the selected fire areas to actuate in the early stage of a fire. This was accomplished by reviewing engineering drawings for fire detector types, spacing, locations, the licensee's technical evaluation of the detector locations and the ceiling reinforcing plans and beam schedule drawings to determine the location of ceiling bays. After the ceiling bay locations were identified, the ~~inspectorsteam~~ conducted field tours of the accessible portions of the fire detection systems in ~~F~~fire ~~A~~areas 9 and 13 to confirm that detector locations were consistent with the licensee's engineering drawings, FHA, engineering evaluations, and each bay was protected by a fire detector in accordance with the ~~C~~Code of ~~R~~Record requirements - NFPA 72E, 1990. ~~-~~In addition, the ~~inspectorsteam~~ reviewed surveillance procedures and the detection system operating requirements specified in Sections 9.3 and ~~93/~~9.4 of the FPR to determine the adequacy of fire detection component testing and to ensure that the detection systems could function when needed.

The inspectorsteam reviewed the adequacy of the design and installation of the automatic pre-action sprinkler system and water curtains surrounding unsealed vertical openings and the stairwells of the Unit 3 rReactor bBuilding eElevation 621 ft.621' (Fire AreaZone 3-4). The inspectorsteam performed in-plant walked down downs of the system to evaluate proper type, placement, spacing of the sprinkler heads, and the extent of the sprinkler head obstructions for effectiveness to prevent a fire from spreading to adjacent fire zones. In addition, the inspectorsteam examined the sprinkler system hydraulic design calculations to verify that the system could be supplied at sufficient pressure and flow volume to produce the required water density for the protected area. Selected engineering evaluations for NFPA code deviations were reviewed and compared with the physical configuration of the system. Additionally, the inspectorsteam reviewed the physical configuration of electrical raceways and SSDsafe shutdown components in the selected fire areas to determine whether water from a pipe rupture, actuation of the automatic suppression system, or manual fire suppression activities in this area could cause damage that could inhibit the plant's ability to reach a SSD condition.

The inspectorsteam reviewed the manual suppression standpipe and fire hose system to verify adequate design, installation, and operation in the selected fire areas. The inspectorsteam examined design flow calculations and flow measurement/pressure test data to verify that the required fire hose water flow for each protected area was available. The inspectorsteam performed in-plant walk-downs and observed placement of the fire hoses and extinguishers to confirm consistency with the fire fighting pre-plan drawings. Additionally, the inspectorsteam checked a sample of manual fire hose lengths to determine whether they would reach the SSD equipment in the selected fire areas. This was done to ensure that manual fire fighting efforts could be accomplished in the selected areas.

b. Findings

No findings of significance were identified.

.11 Compensatory Measures

a. Inspection Scope

The inspectorsteam reviewed the administrative controls for out-of-service, degraded, and/or inoperable, fire protection features, ventilation systems, and post-fire SSD systems and components. The review was performed to verify that the risk associated with removing fire protection and/or post-fire systems or components from service werewas properly assessed and adequate compensatory measures were implemented in accordance with the licensee's technical specifications (TS) and the approved FPPfire protection program. The inspectorsteam also reviewed the adequacy of short-termshort term compensatory measures to compensate for a degraded function or feature until appropriate corrective actions were taken.

b. Findings

Introduction: A Green non-cited violation (NCV)~~n unresolved item~~ was identified ~~into document the inspectors' observations~~ that the licensee ~~had recently~~ made ~~two~~ changes to the approved FPP which decreased the effectiveness of the program without prior Commission approval. The licensee inappropriately used the License Condition Impact Evaluation (LCIE) change process to revise the FPP to allow the removal of fire suppression systems and/or fire rated barrier assemblies, necessary to satisfy the separation and suppression requirements of 10 CFR 50, Appendix R, Sections III.G.2 and III.G.3, from service without compensatory measures (i.e., fire watches) being implemented.

Description: The approved Browns Ferry FPP is documented in the FPR (and incorporated into the UFSAR by reference). The inspectors~~fire protection program and had not evaluated those changes against a license condition which states in part that changes to the approved fire protection program are allowed without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.~~

~~Description: The team~~ reviewed the operating requirements of selected fire protection features specified in Sections 9.3 and ~~9.3~~/9.4 of the FPRP, in SPP-10.9 (~~, Control of Fire~~ Protection Impairments,) and from the licensee's Fire Protection Impairment Program (FPIP) ~~r~~Report ~~L~~ogs dated September 29, 2003. During ~~the~~ review of the FPIP report log, the ~~i~~nspectors~~team~~ found that the licensee had removed the following fire protection features from service:-

- ~~T~~the pre-action ~~sprinkler~~ fire suppression sprinkler systems for the Unit 2 and 3 high pressure core injection ~~(HPCI)~~ areas (FPIP No. 03-287);
- Penetration seals~~Penetrations~~ in a fire barrier wall separating the Unit 1 reactor building from ~~fire area 16,~~ the control building (FPIP No. 03-303).

The ~~i~~nspectors~~team~~ noted that the licensee had removed these fire protection features from service without compensatory measures being implemented (i.e., without fire watches being posted in the affected plant areas). Upon investigation, t~~T~~he inspectors found~~team determined~~ that the licensee had changed the FPP requirements for implementing~~fire protection program with respect to~~ compensatory measures under certain plant conditions.

The Browns Ferry FPP is based on following defense-in-depth (DID) elements (FPR, Volume 1, Section 4.2):

- Prevent fires from starting;
- Detect fires quickly and rapidly suppress those fires that occur to limit damage;
- Design plant safety systems so that a fire which starts in spite of the fire prevention efforts and burns for a significant period of time in spite of fire suppression activities will not prevent essential plant safety functions from being performed.

Defense-in-depth holds that a weakness in one of the above elements can be offset by enhancing the other elements. Fire watches are the most common industry compensatory measure used to help prevent fires. Fire watches strengthen the fire

prevention DID element by looking for uncontrolled ignition sources, fire hazards, and combustible materials, and by providing prompt notification of such hazards. In addition, fire watches can strengthen the fire detection and suppression DID element because they are either continuously present within or regularly survey an area for fire. In this case, the fire watch would notify the main control room to call out the fire brigade, give the fire brigade exact information about the location and nature of the fire, and may initiate fire suppression activities if trained to do so.

The inspectors reviewed the licensee's LCIE associated with Revision 20 of the FPR. This LCIE evaluated changes to the FPR that removed fire watches as a compensatory measure for impairments of the water spray, water sprinkler, or gaseous CO_2 fire suppression systems and/or fire rated assemblies (i.e., fire barriers). Prior to this change, the Browns Ferry NRC-approved FPP required that, ~~the program had previously required the licensee to post either a continuous or one-hour compensatory fire watch patrols with backup suppression equipment~~ whenever a required fire suppression system and/or fire rated barrier assembly was inoperable, either a continuous or a one-hour compensatory fire watch patrol (with backup suppression equipment) be stationed. The LCIE concluded that the assignment and presence of fire watch personnel for the purpose of detecting and reporting fires with operable fire detection equipment was unnecessary and provided minimal additional fire protection safety margins. The evaluation also stated that, with the detection system functioning and the alternate suppression equipment available, the response was comparable with the fire watch in place and that the ability to safely shut down the plant was not adversely affected. The inspectors noted, however, that the licensee's change evaluation did not provide a technical basis for these conclusions. Based on this evaluation, the licensee revised the FPR, Volume 1, Sections 7.5, 9.3.11.C, 9.3.11.D, and 9.3.11.a.3, to delete ~~is inoperable, and the licensee had changed it to remove~~ the requirements for fire watches due to inoperable fire protection systems and features if the associated fire detection system is operable.

The inspectors concluded that the licensee inappropriately used the fire protection program change process to revise the FPP on October 23, 2002, to permit removing fire suppression systems and/or fire rated barrier assemblies from service without enhancing the other DID elements as a ~~of fire watches as~~ compensatory measure. Specifically, the revised FPP allowed degraded or inoperable ~~due to impairments of~~ fire suppression systems and fire barriers necessary to satisfy the separation and suppression requirements of 10 CFR 50, Appendix R, Sections III.G.2 and III.G.3, without establishing ~~rated barrier assemblies as long as associated fire detection is operable. In addition, the team noted that at Browns Ferry, compensatory fire watch duties consists of detecting and reporting fires or sign of fire. The~~ compensatory fire watches in the affected plant areas as long as fire detection systems were functional. The change ~~are not trained or assigned the duties to inspect for control of fire hazards, ignition sources, or combustible materials introduced in the assigned fire watch area. The team found that the licensee had not evaluated these FPP changes against the "defense-in-depth" principles of the approved FPP and had not explicitly determined whether these changes would~~ adversely affected the ability to achieve and maintain safe shutdown in the event of a fire, in that, the licensee went from full compliance with the ~~in the affected areas.~~

~~The NRC previously identified an issue at the Sequoyah Nuclear Power Plant (Unresolved Item (URI) 50-327,328/02-04-01) regarding the acceptability of similar changes to the approved~~ fire protection safe shutdown system separation and

suppression criteria to less than full compliance without implementing temporary measures to compensate for weakness in this DID element. This was contrary to the safety objectives of the FPP and constituted a change from the approved program that required NRC approval prior to implementation. However, no NRC approval was obtained by the licensee.

Analysis: Because issues related to the fire protection change process are considered to be findings that could potentially impede or impact the regulatory process, they are dispositioned using the traditional enforcement process instead of the SDP. In this case, the issue was significant because the licensee's change process for the fire protection program allowed a decrease in the effectiveness of the fire protection program to be accepted without prior NRC approval. Furthermore, this issue had a credible impact on safety because the licensee's failure to properly evaluate the removal of fire watch posting requirements could adversely affect or degrade the ability for achieving and maintaining SSD from the main control room, local shutdown stations, or alternate shutdown stations. However, the inspectors determined that this finding was of very low significance because, based on an assessment of the impacts of the identified fire protection features removed from service, the licensee's overall SSD capabilities in the affected fire areas and related FPP features (fire brigade) remained adequate to achieve and maintain SSD conditions.

Enforcement. 10 CFR 50.48(a) states, in part, that each operating nuclear power plant must have a fire protection program. Browns Ferry Unit 2 Operating License Condition 2.C.(14) and Browns Ferry Unit 3 Operating License Condition 2.C.(7) state, in part, that Browns Ferry Nuclear Plant "may make changes to the approved FPP without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain SSD in the event of a fire."

Contrary to the above, the licensee changed the Browns Ferry FPP to remove the requirement to implement fire watches for impaired fire protection systems and features which were~~program for establishment of~~ a compensatory measure necessary to assure the ability to achieve and maintain safe shutdown in the event of fire. This violation impacted the NRC's ability to perform its regulatory function and, as such, was evaluated in accordance with guidance in Sections IV.A.1 through IV.A.4 and Section IV.B of the NRC's Enforcement Policy. Based on this guidance, this violation of 10 CFR 50.48 and the Unit 2 and Unit 3 Operating License Conditions is classified as a Severity Level IV violation because it resulted in conditions that were evaluated as having very low safety significance. Because this change to the FPP is of very low safety significance and has been entered the finding into the licensee's CAP (~~measures fire watch.~~

~~Analysis: The risk significance of these observations has not yet been evaluated.~~

~~Enforcement: In response, the licensee initiated~~ PER 03-018593-000), this violation is being treated as an NCV in accordance with Section VI.A.1 of the NRC's Enforcement Policy: NCV 05000260,296/2003007-02,~~, based on a generic review of PER 03-011569-000 which tracks the issue at Sequoyah Nuclear Power Plant. Pending additional review by the NRC, this issue is identified as Unresolved Item (URI) 50-260,296/03-07-0XX, Review of Evaluations for~~ Changes Made to the~~Approved~~ Fire Protection Program Regarding Compensatory Fire Watch Implementation Without NRC~~and Fire Watch Duties.~~ Approval.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors~~Corrective action program (CAP) problem evaluation reports (PERs) resulting from fire, smoke, sparks, arcing, and equipment overheating incidents for the last 18 months were reviewed to assess the frequency of fire incidents and to identify any maintenance or material condition problems related to fire incidents. The team also reviewed other CAP documents, including completed corrective actions documented in selected PERs, and operating experience program (OEP) documents to verify that industry-identified fire protection problems potentially or actually affecting Browns Ferry were appropriately entered into and resolved by the CAP process. Items included in the OEP effectiveness review were NRC Information Notices, industry or vendor-generated reports of defects and noncompliance under 10 CFR Part 21, and vendor information letters. The team reviewed Unit 2 and 3 fire protection systems health reports for the lat six quarters to evaluate the prioritization for resolving fire protection related deficiencies and the effectiveness of corrective actions. In addition, the team~~ reviewed a sample of licensee audits, self-assessments and PERs~~of the fire protection program~~ to verify that items related to the Browns Ferry FPP, and the capability to successfully achieve and maintain the plant in a SSD condition following a plant fire,~~fire protection and to SSD~~ were appropriately entered into the licensee's CAP in accordance with the Browns Ferry quality assurance program and procedural requirements. The items selected were reviewed for classification and appropriateness of the corrective actions taken or initiated to resolve the issues. In addition, the inspectors reviewed the licensee's evaluations of and corrective actions for selected industry experience issues related to the fire protection area. The operating experience reports were reviewed to verify that the licensee's review and actions were appropriate. Additionally, the inspectors reviewed audits and self-assessments of the Browns Ferry FPP to assess the types of findings that were generated and that the findings were appropriately entered into the licensee's CAP.

b. Findings~~-~~

No findings of significance were identified.

Mail Envelope Properties (3FCBA788.888 : 20 : 51263)

Subject:	MY REVIEW OF YOUR BF INPUT
Creation Date:	12/1/03 3:41PM
From:	Charles R. Ogle
Created By:	CRO@nrc.gov

Recipients	**Action**	**Date & Time**
nrc.gov		
ATL_PO.ATL_DO	Delivered	12/01/03 03:41PM
GRW (Gerald Wiseman)	Opened	12/02/03 07:26AM

Post Office	**Delivered**	**Route**
ATL_PO.ATL_DO	12/01/03 03:41PM	nrc.gov

Files	**Size**	**Date & Time**
Doc3.wpd	61274	12/01/03 03:26PM
MESSAGE	1904	12/01/03 03:41PM

Options

Auto Delete:	No
Expiration Date:	None
Notify Recipients:	Yes
Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard
To Be Delivered:	Immediate
Status Tracking:	Delivered & Opened