

**From:** Neil O'Keefe  
**To:** Cruz, Jeffrey; Farnholtz, Thomas; Guerra, Gilbert; Jaffe, David; Johnson, William D.; Mullikin, Ray; Nease, Rebecca; Smith, Linda  
**Date:** 2/4/04 11:52AM  
**Subject:** STP Conference Call

PEB has arranged a conference call to briefly discuss the status of the unresolved items from the 2002 triennial fire protection inspection. The objective of the discussion is to determine if the issues have evolved as the licensee has been working on them, and to assure that there continues to be an interim basis to safely operate the plants until the inspections can be completed. Background material is attached.

The call will be held in the DRMA conference room at 3:30 pm CST (4:30 EST) today. The bridge number for callers is (817) 276-4475. There is no pass code necessary.

**CC:** Chamberlain, Dwight; Good, Gail; Howell, Art; Mallett, Bruce

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STP Conference Call Agenda  
Wednesday, Feb. 4, 3:30 pm

**Topic:** Status of two URIs in fire protection

**Background:** During the May-June 2002 triennial fire protection inspection, the team identified concerns that the licensee's fire safe shutdown analyses did not appear to directly support their procedures. Also, the manual actions necessary to accomplish a safe shutdown during a fire were mostly not located in approved procedures, and were not understood by operators. The licensee agreed to clarify the documentation to allow completion of the inspection within a few months. Subsequently, a new fire response procedure was issued with all the required manual actions, and a new thermal-hydraulic analyses was created to support the control room evacuation scenario as the bounding case. This analysis identified that the procedural limit for cooldown rate would not allow the plant to meet the performance requirements of Appendix R, Section III.L.

**Objective:** To understand any changes to the scope of the issues that have evolved since the conclusion of the inspection as a result of the licensee's investigation, analyses, and procedure changes. This is intended to assure there continues to be an interim basis for assuring the safe operation of the plant until the remaining issues can be inspected, as well as supporting the prioritization of scheduling inspection resources.

Issue

The licensee's procedures for assuring a safe shutdown relied upon diagnosing the effects of the fire using installed instrumentation. There was no documentation available indicating which instrumentation was to remain free of fire damage for a fire in any specific area.

Manual actions to support fire safe shutdown were not located in an approved plant procedure. Operators were trained to use the Operator Action List as recommended guidance, while engineering considered them mandatory actions.

Analytical documentation to support safe shutdown in a fire was fragmented, and did not appear to reflect the actions and assumptions in the current procedures. For example, the principle analysis assumed no CCPs would be available, and the PDP would be used for RCP seal cooling only, whereas the procedures established CCP charging and letdown.

Safety Basis

The licensee has provided documentation of what required instrumentation will remain free of fire damage for each fire area. This information was incorporated into the new fire response procedure. PEB will review this information in-office in the near-term.

The licensee conducted training, then conducted a drill in summer 2002. The residents identified that the operators still did not perform the required actions, so the licensee created a detailed fire response procedure. The residents observed two successful simulator and fire brigade drills using the new procedure in Fall 2003.

The licensee proposed to assemble documentation to demonstrate that adequate documentation existed, but then created a new analysis. It is not clear what triggered this change, but we need to understand if new issues or implications were identified. Address in teleconference.