

- RIT
- Morris RIT
- Karjala RIT

From: Doris Chyu
To: RMM3@nrc.gov, DAK2@nrc.gov,
Date: 5/13/04 5:19PM
Subject: Re: Writeup that I promised you last week



~~I~~ will be on your help.

] and will be back at Point Beach on May 24th. Thanks again for all

~~is~~ Ex. 6

Duane

>>> Doris Chyu 05/10/04 07:34AM >>>

Any question, please give me a call. I am still reading your inspection report writeup. Who should I call if I have comments?

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 5, 6

FOIA PA-2004-0282

L-27

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- Page 65, Appendix A to BTP, "The guidelines of the above cited BTP were adopted for this appendix and are preferred in all instances." The philosophy of BTP in designing fire protection program is reflected on Page 18 of BTP, "A nuclear power plant must maintain its capability to combat a fire under any operating condition with fuel onsite."
- Page 57 in Appendix A, Design Bases, "The overall fire protectionand minimize radioactive releases to the environment." This is very clear and consistent with BTP that fire protection program is required under all modes of operation. A small portion of the fire protection program (Appendix R, Section III) may not apply during shutdown since safe shutdown was achieved already. However, other portions of the program should be still in place.
- Appendix A and Appendix R to 10 CFR 50 were silent on the modes of operations during which the fire protection program applies.

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- Appendix R, 3rd paragraph, clearly defined what is "safety-related" vs "safe shutdown". Section III.K.2, in defining administrative control for combustible control, stated, "prohibit the storage of combustibles in safety-related areas or establish designated storage areas with appropriate fire protection." Criterion 3 in Appendix A (one of the underlying requirement for fire protection as discussed in 50.48) discussed structure, systems, and components important to safety. The combustible control program should not be limited to "safe shutdown" areas but include areas important to safety and safety-related area.
- Pages 69-70, "administrative control." of Appendix A to BTP discussed the bulk storage as transient combustibles, not something permanently installed. The permanently installed equipment as part of a system was later discussed on Page 81.

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The following areas were inspected by walkdowns:

- Fire Zone 505, Unit 1 Containment, 8 foot;
- Fire Zone 511, Unit 1 Containment, 21 foot;
- Fire Zone 516, Unit 1 Containment, 48 foot;
- Fire Zone 520, Unit 1 Containment, 66 foot;
- Fire Zone 263, Primary Auxiliary Building Maintenance Area; and
- Fire Zone XXX, XXXXXXXX.

b. Findings



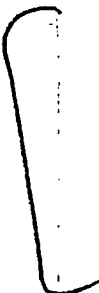
Ex
5





1R06 Flood Protection Measures - External Floods (71111.06)

a. Inspection Scope

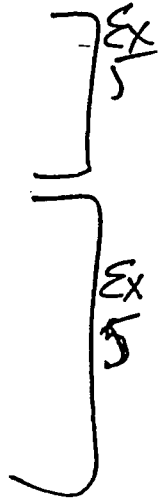


b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope



(ii) Identify the various positions within the licensee's organization that are responsible for the program;

(iii) State the authorities that are delegated to each of these positions to implement those responsibilities; and

(iv) Outline the plans for fire protection, fire detection and suppression capability, and limitation of fire damage.

(2) The plan must also describe specific features necessary to implement the program described in paragraph (a)(1) of this section such as—

(i) Administrative controls and personnel requirements for fire prevention and manual fire suppression activities;

(ii) Automatic and manually operated fire detection and suppression systems; and

(iii) The means to limit fire damage to structures, systems, or components important to safety so that the capability to shut down the plant safely is ensured.

(3) The licensee shall retain the fire protection plan and each change to the plan as a record until the Commission terminates the reactor license. The licensee shall retain each superseded revision of the procedures for 3 years from the date it was superseded.

(b) Appendix R to this part establishes fire protection features required to satisfy Criterion 3 of appendix A to this part with respect to certain generic issues for nuclear power plants licensed to operate before January 1, 1979.

(1) Except for the requirements of Sections III.G, III.J, and III.O, the provisions of Appendix R to this part do not apply to nuclear power plants licensed to operate before January 1, 1979, to the extent that—

(i) Fire protection features proposed or implemented by the licensee have been accepted by the NRC staff as satisfying the provisions of Appendix A to Branch Technical Position (BTP)

APCSB 9.5-1 was published in August 1976.

(2) With respect to all other fire protection features covered by Appendix R, all nuclear power plants licensed to operate before January 1, 1979, must satisfy the applicable requirements of Appendix R to this part, including specifically the requirements of Sections III.G, III.J, and III.O.

(c)–(e) [Reserved]

(f) Licensees that have submitted the certifications required under § 50.82(a)(1) shall maintain a fire protection program to address the potential for fires that could cause the release or spread of radioactive materials (i.e. that could result in a radiological hazard).

(1) The objectives of the fire protection program are to—

(i) Reasonably prevent these fires from occurring;

(ii) Rapidly detect, control, and extinguish those fires that do occur and that could result in a radiological hazard; and

(iii) Ensure that the risk of fire-induced radiological hazards to the public, environment and plant personnel is minimized.

(2) The licensee shall assess the fire protection program on a regular basis. The licensee shall revise the plan as appropriate throughout the various stages of facility decommissioning.

(3) The licensee may make changes to the fire protection program without NRC approval if these changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard, taking into account the decommissioning plant conditions and activities.

[65 FR 38190, June 20, 2000]

§ 50.49 Environmental qualification
electric equipment important
safety for nuclear power plants.