

April 28, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer and
Senior Vice President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville IL 60555

SUBJECT: CLINTON POWER STATION
NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION
BASELINE INSPECTION AND REQUEST FOR INFORMATION
05000461/2008006(DRS)

Dear Mr. Pardee:

On July 7, 2008, the U.S. Nuclear Regulatory Commission (NRC) will begin a triennial fire protection baseline inspection at your Clinton Power Station. This inspection will be performed in accordance with the NRC Baseline Inspection Procedure 71111.05T.

The schedule for the inspection is as follows:

- Information gathering visit: June 18 - 20, 2008
- On-site inspection activity: July 7 - 11, 2008, and July 21 - 25, 2008

The purpose of the information gathering visit is: (1) to obtain information and documentation needed to support the inspection; (2) to become familiar with the Clinton Power Station's fire protection programs, fire protection features, post-fire safe shutdown capabilities, and plant layout; and (3) to arrange administrative details such as office space, availability of knowledgeable office personnel, and to ensure unescorted site access privileges.

Experience has shown that the baseline fire protection inspections are extremely resource intensive both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both organizations, we have enclosed a request for documents needed for the inspection. These documents have been divided into four groups. The first group lists information necessary to aid the inspection team in choosing specific focus areas for the inspection. It is requested that this information be provided to the lead inspector via mail or electronically no later than June 2, 2008. The second group lists information necessary to ensure that the inspection team is adequately prepared for the inspection. This information should be available on-site no later than June 18, 2008. The third group of requested documents is those items that the team will review, or need access to, during the inspection. Please have this information available by the first day of the on-site portion of the inspection (July 7, 2008). The fourth group lists information necessary to aid the inspection team in tracking issues identified as a result of the inspection.

It is requested that this information be provided to the lead inspector as the information is generated during the inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the on-site portions of the inspection.

The lead inspector for this inspection is Mr. Benny Jose. We understand that our regulatory contact for this inspection is Mr. Ron Frantz of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at (630) 829-9756 or via e-mail at Benny.Jose@nrc.gov.

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/

Julio F. Lara, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-461
License Nos. NPF-62

Enclosure: FIRE PROTECTION INSPECTION DOCUMENTS REQUEST

cc w/encl: Site Vice President – Clinton Power Station
Plant Manager – Clinton Power Station
Regulatory Assurance Manager – Clinton Power Station
Chief Operating Officer and Senior Vice President
Senior Vice President – Midwest Operations
Senior Vice President – Operations Support
Vice President – Licensing and Regulatory Affairs
Director – Licensing and Regulatory Affairs
Manager Licensing – Clinton, Dresden and Quad Cities
Associate General Counsel
Document Control Desk – Licensing
Assistant Attorney General
J. Klinger, State Liaison Officer
Illinois Emergency Management Agency
Chairman, Illinois Commerce Commission

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Sincerely,

Julio F. Lara, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-461
License Nos. NPF-62

Enclosure: FIRE PROTECTION INSPECTION DOCUMENT REQUEST

cc w/encl: Site Vice President – Clinton Power Station
Plant Manager – Clinton Power Station
Regulatory Assurance Manager – Clinton Power Station
Chief Operating Officer and Senior Vice President
Senior Vice President – Midwest Operations
Senior Vice President – Operations Support
Vice President – Licensing and Regulatory Affairs
Director – Licensing and Regulatory Affairs
Manager Licensing – Clinton, Dresden and Quad Cities
Associate General Counsel
Document Control Desk – Licensing
Assistant Attorney General
J. Klinger, State Liaison Officer
Illinois Emergency Management Agency
Chairman, Illinois Commerce Commission

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NAME	BJose: ls		JLara					
DATE	04/28/08		04/28/08					

OFFICIAL RECORD COPY

Letter to Mr. Charles G. Pardee from Mr. Julio F. Lara, dated April 28, 2008.

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NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION
BASELINE INSPECTION AND REQUEST FOR INFORMATION
05000461/2008006(DRS)

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FIRE PROTECTION INSPECTION DOCUMENT REQUEST

Inspection Report: 05000461/2008006(DRS)

Inspection Dates: June 18 through 20, 2008, Information Gathering Visit
July 7 through 11, 2008, On-site Inspection Activity
July 21 through 25, 2008, On-site Inspection Activity

Inspection Procedures: IP 71111.05T, "Fire Protection (Triennial)"
IP 71152, "Identification and Resolution of Problems"

Inspectors: Benny Jose, Lead Inspector
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Benny.Jose@nrc.gov

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(630) 829 9743
George.Hausman@nrc.gov

Darrell L. Schrum,
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I. Information Requested Prior to the Information Gathering Visit

The following information is requested by June 2, 2008. If you have any questions regarding this information, please call the lead inspector as soon as possible. All information may be sent electronically (to Mr. Benny Jose, e-mail address Benny.Jose@nrc.gov) or provide on compact disc (the preferred method). If compact discs are provided, three sets (one for each inspector) are requested.

1. The reactor plant's Individual Plant Examination for External Events (IPEEE) for fire, results of any post-IPEEE reviews for fire, and listings of actions taken and/or plant modifications conducted in response to IPEEE information for fire. Alternatively, probabilistic risk analyses for fire and associated information, if it exists and is more recent than the IPEEE.
2. A list of fire areas requiring alternative shutdown capability, i.e., those areas for which 10 CFR Part 50, Appendix R, Section III.G requirements are satisfied under Section III.G.3, or where both safe shutdown trains can be affected.
3. Plant operating procedures which would be used and describe shutdown for a postulated fire (for both areas requiring alternative shutdown and areas which do not require alternative shutdown). Only those procedures with actions specific to shutdown in the event of a fire need be included.

FIRE PROTECTION INSPECTION DOCUMENT REQUEST

II. Information Requested During the Information Gathering Visit (June 18 - 20, 2008)

This information is requested to be available in one set of hard-copy documents (where possible) on-site during the information gathering visit. In addition, if the requested information is available electronically, it is requested that the information be provided on three sets of compact discs (searchable, if possible).

1. Licensing Information:
 - a. The facility license, including the fire protection license condition;
 - b. All Nuclear Regulatory Commission (NRC) Safety Evaluation Reports (SERs) applicable to fire protection (specifically including those SERs referenced by the plant fire protection license condition) and all other associated licensing correspondence applicable to fire protection;
 - c. The fire protection program and applicable portions of the Updated Safety Analysis Report, as referenced by the fire protection license condition;
 - d. Exemptions from 10 CFR 50.48 and 10 CFR Part 50, Appendix R, and associated licensing correspondence; and
 - e. All licensing correspondence associated with the comparison to Standard Review Plan (NUREG-0800), Section 9.5.1 or equivalent for licensing purposes.
2. Fire Protection Program:
 - a. If not already provided under Item II (1)(c) above, fire protection program documents including fire hazards analyses and post-fire safe shutdown analyses;
 - b. A listing of changes made to the fire protection program (including associated adverse to safe shutdown analyses);
 - c. A listing of the protection methodologies identified under 10 CFR Part 50, Appendix R, Section III.G used to achieve compliance for selected fire zones/areas (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 each selected fire zone/area;

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- d. A list of Generic Letter 86-10 evaluations (i.e., a list of adverse to safe shutdown evaluations);
 - e. A list of applicable codes and standards related to the design of plant fire protection features. The list should include National Fire Protection Association (NFPA) code versions committed to (i.e., the NFPA codes of record);
 - f. A list of plant deviations from code commitments and associated evaluations;
 - g. Facility layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment; and
 - h. Logic diagrams showing the components used to achieve and maintain hot standby and cold shutdown.
3. Facility Information:
- a. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability;
 - b. Facility layout and equipment drawings which identify the physical facility locations of hot standby and cold shutdown equipment for selected fire zones/areas (to be determined during information gathering visit);
 - c. One-line schematic drawings of the electrical distribution system for 4160 Volts-alternating current (Vac) down to 480 Vac;
 - d. One-line schematic drawings of the electrical distribution system for 250 Volts-direct current (Vdc) and 125 Vdc systems as applicable; and
 - e. Safe shutdown cable routing database (requested electronically such as on compact disc), if available.
4. Operations Response for Fire Protection:
- a. Pre-fire plans for selected fire zones/areas (to be determined during information gathering visit).

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5. Corrective Actions:
 - a. Listing of open and closed fire protection condition reports (i.e., problem identification forms and their resolution reports) since the date of the last triennial fire protection inspection; and
 - b. Listing of fire impairments since the date of the last triennial fire protection inspection.
6. General Information:
 - a. A listing of abbreviations and/or designators for plant systems;
 - b. Organization charts of site personnel down to the level of fire protection staff personnel; and
 - c. A phone list for on-site licensee personnel.
7. On-Site Discussions:

In addition, during the information gathering visit, it is requested that licensee staff be available for the following:

 - a. Informal discussion on plant procedures operators would use in the event of fire and under what conditions would the plant be shutdown using alternative shutdown methodology;
 - b. Informal discussion on the plant's safe shutdown cable routing database and the plant-wide cable routing database, as applicable; and
 - c. A tour of alternative shutdown and risk significant fire areas.

III. Information Requested to be Available on First Day of Inspection (July 7, 2008)

This information is requested to be available in one set of hard-copy documents (where possible) on-site on first day of inspection. In addition, if the requested information is available electronically, it is requested that the information be provided on three sets of compact discs (searchable, if possible).

1. Procedures:
 - a. List of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade);

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- b. List of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps, and suppression systems;
 - c. List of maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis;
 - d. List of procedures and/or instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design; and
 - e. List of procedures and/or instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
2. Design and Equipment Information:
- a. Coordination calculations and/or justifications that verify fuse/breaker coordination for selected fire zones/areas (to be determined during information gathering visit) that are fed off of the same electrical buses as components in the protected safe shutdown train;
 - b. Copies of significant fire protection and post-fire safe shutdown related design change package descriptions (including their associated 10 CFR Part 50.59 evaluations) and Generic Letter (GL) 86-10 (or adverse to safe shutdown) evaluations;
 - c. Gaseous suppression system pre-operational testing, if applicable, for selected fire zones/areas (to be determined during information gathering visit);
 - d. Hydraulic calculations and supporting test data which demonstrate operability for water suppression systems, if applicable, for selected fire zones/areas (to be determined during information gathering visit);
 - e. Alternating current (AC) coordination calculations for 4160 Vac down to 480 Vac electrical systems; and
 - f. Vendor manuals and information for fire protection equipment (such as detection, suppression systems, fire pumps), applicable to selected fire zones/areas (to be determined during information gathering visit). It is acceptable to make vendor manuals available to the inspectors in lieu of providing a copy.

FIRE PROTECTION INSPECTION DOCUMENT REQUEST

3. Assessment and Corrective Actions:
 - a. The three most recent fire protection Quality Assurance (QA) audits and/or fire protection self-assessments; and
 - b. Corrective action documents (e.g., condition reports, including status of corrective actions) generated as a result of the three most recent fire protection Quality Assurance (QA) audits and/or fire protection self-assessments.

IV. Information Requested to Be Provided Throughout the Inspection

1. Copies of any corrective action documents generated as a result of the team's questions or queries during this inspection; and
2. Copies of the list of questions submitted by the team members and the status/resolution of the information requested (provide daily during the inspection to each team member).

If you have questions regarding the information requested, please contact the lead inspector.