



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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April 15, 2009

John T. Conway
Senior Vice President &
Chief Nuclear Officer
Pacific Gas and Electric Company
P. O. Box 3
Mail Code 104/6/601
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON, UNITS 1 AND 2 - NOTIFICATION OF AN NRC TRIENNIAL
FIRE PROTECTION BASELINE INSPECTION (NRC INSPECTION
REPORT 05000275/2009008 and 05000323/2009008) REQUEST FOR
INFORMATION

Dear Mr. Conway:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region IV staff will conduct a triennial fire protection baseline inspection at your Diablo Canyon facility in July 2009. The inspection team will be comprised of reactor inspectors from the NRC Region IV office. The team will conduct the inspection in accordance with the baseline Inspection Procedure 71111.05TTP, "Fire Protection-NFPA 805 Transition Period (Triennial)."

The schedule for the inspection is as follows:

- Information gathering visit: June 10 - 11, 2009
- Onsite inspection: July 06 - 10, 2009
July 20 - 24, 2009

Three individuals will participate in the information gathering visit, to select the fire areas for evaluation, identify additional documents needed to support the inspection, obtain unescorted access, meet with the key personnel who will support the inspection, and become familiar with your fire protection program. The enclosure to this letter provides an initial list of the documents the team will want to review. We request that your staff transmit copies of the documents listed in the enclosure to the NRC Region IV office for team use in preparation for the inspection. Please send this information so that it will arrive in our office in Arlington, Texas, by the dates listed in the enclosure.

We request that during the onsite inspection weeks, you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents that establish that your fire protection program satisfies the NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel knowledgeable of: (1) plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, (2) the electrical aspects of the post-fire safe shutdown analyses, (3) reactor plant

fire protection systems, and (4) the fire protection program and its implementation should be available to support the team at the site during the inspection.

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).

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 the lead inspector, John Mateychick, at 817-276-6560.

Sincerely,

/RA/

Neil O'Keefe, Chief
Engineering Branch 2
Division of Reactor Safety

Dockets: 50-275; 50-323
Licenses: DPR-80; DPR-82

Enclosure: Triennial Fire Protection
Inspection Supporting Documentation

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File located: R:REACTORS\DC 2009008 RFI-TFP

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J. Mateychick	N.O'Keefe				
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ENCLOSURE

Triennial Fire Protection Inspection Documentation Requested

Please provide the following documentation items 1 - 4 prior to the onsite information-gathering visit, preferably no later than June 1, 2009. Where practical, please provide copies electronically.

1. The current version of your fire protection program and fire hazards analysis.
2. Post-fire safe shutdown analysis and the supporting calculations that demonstrate acceptable plant response.
3. Copies of the licensing basis documents for fire protection (Safety Evaluation Reports, pertinent sections of the Final Safety Analysis Report, exemptions, deviations, letters to/from the NRC regarding fire protection/fire safe shutdown, etc.).
4. The Fire Probabilistic Risk Assessment or portions of the plant's Individual Plant Examination for External Events report addressing fire events.

Please provide the following documentation items 5 - 37 during the information-gathering visit or by June 29, 2009, in order to support inspection preparation. Whenever practical, please provide copies electronically. However, drawings should be provided as paper copies of sufficient size that all details are legible.

5. Plant layout and equipment drawings for the selected fire areas (these areas will be selected during the information gathering trip) that identify: (a) the physical plant locations of major hot standby and cold shutdown equipment; (b) plant fire area and/or fire zone delineation; and (c) the locations of fire protection equipment, such as detection, suppression, and post-fire emergency lighting units; and (d) fire area boundaries.
6. Fire protection program implementing procedures (e.g., administrative controls, operator response procedures for fires, fire fighting procedures, etc.).
7. Operating procedures used for achieving and maintaining hot and cold shutdown conditions from the control room in the event of a fire outside the control room (III.G.2 areas).
8. Operating procedure(s) used to implement an alternative shutdown (III.G.3 areas) capability with or without control room evacuation.
9. Pre-fire plans for the selected fire areas (areas to be selected by the team during the information-gathering trip).
10. A list of equipment used to achieve and maintain hot standby and cold shutdowns in the event of a fire (safe shutdown equipment lists).

11. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for normal and alternate shutdown. Please provide one copy of the piping and instrumentation (flow) diagrams for these systems of a size sufficient to read all details. These should include the systems used for RCS makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems.
12. A listing of design change packages which were determined to impact fire protection and post-fire safe shutdowns, performed in the last 3 years.
13. Copies of Generic Letter 86-10 evaluations performed in the last 3 years.
14. A listing of open and closed corrective action documents initiated in the last 3 years, which relate to the fire protection program or equipment. Include corrective action document number, date, and subject.
15. A listing of the applicable codes and standards (with the versions) related to the design of plant fire protection features and evaluations of any code deviations.
16. Drawings of the portions of the emergency lighting system which support fire response and post-fire safe shutdown.
17. Procedures used to remove smoke from safety-related areas and the engineering studies or calculations which support the design basis.
18. Drawings of communication systems credited in the license basis for firefighting and plant operations during fires where control room is occupied and/or evacuated.
19. Piping and instrumentation (flow) diagrams for the fire water and sprinkler systems.
20. A listing of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
21. Maintenance Rule performance criteria and a summary of the last 3 years' performance history for fire protection program systems or functions monitored within the Maintenance Rule program.
22. A copy of fire protection program requirements (e.g. limiting conditions for operation, surveillance test requirements) covered by Technical Specifications, Technical Requirements Manual, Updated Final Safety Analysis Report, or similar documents.
23. Copies of internal and external self-assessments, audits, peer-assessments or similar reviews related to post-fire safe shutdown capability or the fire protection program completed since January 1, 2006.
24. A list of manual actions taken outside the control room which are credited to mitigate the consequences of fires in III.G.2 areas (non-alternative shutdown areas). The list should group actions by the initiating fire area or zone and indicate the location where the action must take place.

25. Electronic copies of operator study guides (i.e. lesson plan text and graphics) or design basis documents that describe the purpose/function/operating characteristics of the safe shutdown systems (reactor coolant system (RCS) makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems).
26. Two copies of one-line diagrams of the electrical distribution system. These should depict how power gets from the switchyard to the engineered safety feature loads (480V and 4160V). Also, include the vital DC distribution system one-line diagrams.
27. A list of automatic and manually initiated gaseous fire suppression systems in the plant, giving location and the key equipment being protected.
28. A list of repairs (and the procedure that controls the actions) needed to: a) reach and/or maintain hot shutdown and b) reach and/or maintain cold shutdown.
29. A list of high to low pressure interface valves.
30. A copy of procedures governing the training and operation of the fire brigade.
31. Organization charts of site personnel down to the level of fire protection staff personnel.
32. A contact list of key site personnel who will be supporting this inspection, giving location of their office and phone number onsite.
33. The team would like to observe an unannounced fire brigade drill in the plant, if possible, during the week of July 20, 2009. Please put us in contact with the appropriate personnel for planning drills during the onsite information gathering trip.
34. The team would like to perform a walkthrough of the procedure for control room evacuation due to fire with qualified operators in the plant during the week of July 6, 2009. Please put us in contact with the appropriate personnel for planning the walkthrough during the onsite information gathering trip.
35. Corrective action documents listing fire protection program deficiencies, non-compliances and past violations to be resolved during the transition to NFPA 805.
36. A list of compensatory measures in place for the fire protection program identifying those that are in place due to issues to be addressed by the transition to NFPA 805.
37. Drawings showing the installed location details for fire suppression and detection systems for the selected fire areas (areas to be selected by the team during the information-gathering trip).