



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
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LISLE, IL 60532-4352

February 16, 2010

Mr. Larry Meyer
Site Vice-President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241

**SUBJECT: POINT BEACH NUCLEAR PLANT - NOTIFICATION TO PERFORM A
TRIENNIAL FIRE PROTECTION BASELINE INSPECTION WHILE TRANSITION
TO 10 CFR 50.48(C) IS IN PROGRESS; INSPECTION REPORT
05000266/2010008(DRS); 05000301/2010008(DRS)**

Dear Mr. Meyer:

On May 10, 2010, the U.S. Nuclear Regulatory Commission (NRC) will begin a triennial fire protection baseline inspection at the Point Beach Nuclear Plant. This inspection will be performed in accordance with Inspection Procedure (IP) 71111.05TTP, the NRC's baseline fire protection inspection procedure for plants in the process of implementing the National Fire Protection Association (NFPA) Standard 805 (10 CFR 50.48(c)). The inspection guidance is different from the regular triennial inspections in that the inspectors will concentrate on the fire protection program infrastructure and the adequacy of compensatory measures implemented for identified departures from code requirements. The inspectors will not routinely inspect for or evaluate circuit related issues.

Based on the latest revision to IP 71111.05TTP dated December 24, 2009, changes were made to the IP which now requires the fire protection inspection to review your actions to mitigate postulated events that could potentially cause loss of large areas of power reactor facilities due to explosions or fires. This requirement was implemented by the issuance of the Interim Compensatory Measures Order EA-02-026, Section B.5.b and the subsequent requirements of 10 CFR 50.54(hh)(2), which are collectively referred to as B.5.b requirements. During this inspection, the B.5.b requirements review will be performed during the first on-site week of the inspection starting on May 10, 2010.

The schedule for the on-site inspection activity is as follows:

- Information Gathering Visit: April 27 – 29, 2010;
- B.5.b Requirements: May 10 – 12, 2010; and
- Fire Protection Inspection: May 10 – 14, 2010, and May 24 – 28, 2010.

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 Point Beach Nuclear Plant 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 April 12, 2010. The second group also lists information and areas for discussion necessary to aid the inspection team in choosing specific fire protection focus areas for the inspection and to ensure that the inspection team is adequately prepared for the inspection. It is requested this information be available during the information gathering visit (April 27 – 29, 2010). The third group of requested documents consists of 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 second on-site inspection week (May 10, 2010). The fourth group lists the 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. R. Langstaff. We understand that our regulatory contact for this inspection is Ms. Flentje of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at (630) 829-9747 or via e-mail at ronald.langstaff@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011.

The NRC may not conduct or sponsor, and a person is not required to respond to a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

L. Meyer

-3-

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/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-266; 50-301
License Nos. DPR-24; DPR-27

Enclosure: Fire Protection Inspection Document Request

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**FIRE PROTECTION INSPECTION
DOCUMENT REQUESTS**

Inspection Report: 05000266/2010008(DRS); 05000301/2010008(DRS)

On-site Inspection Dates: April 27 – 29, 2010 (Information Gathering Visit)
May 10 – 12, 2010 (B.5.b Requirements)
May 10 – 14, 2010 (Fire Protection Inspection)
May 24 – 28, 2010 (Fire Protection Inspection)

Inspection Procedures: IP71111.05TTP, "Fire Protection-NFPA 805 Transition Period (Triennial)"
IP71152, "Identification and Resolution of Problems"

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I. Information Requested Prior To the Information Gathering Visit

The following information is requested by April 12, 2010. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Mr. Ronald A. Langstaff (e-mail address ronald.langstaff@nrc.gov). Electronic media is preferred. The preferred file format is a searchable "pdf" file on a compact disk (CD). The CD should be indexed and hyper-linked to facilitate ease of use, if possible. Please provide four copies of each CD submitted (one for each inspector).

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 copy of the current version of the fire protection program (FPP), fire hazards analysis (FHA), safe shutdown analysis (SSA), updated safety analysis report (USAR), technical specifications and license.
3. 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.

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

4. 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.
5. A copy of the current fire protection system "Health Report," if available.
6. A copy of the current plant layout drawings, if available.
7. Status of NFPA 805 (10 CFR 50.48(c)) implementation.

II. Information Requested During the Information Gathering Visit (April 27 - 29, 2010)

The following information is requested to be provided to the inspection team during the on-site information gathering visit. Except for Item 1, it is requested that the following information be provided on four sets of CDs (searchable, if possible) with the B.5.b Mitigating Strategies information (Items 8.a through 8.i) provided on separate CDs. In addition, two sets of hard copy drawings are requested for Items 4.a. through 4.f.

1. One set of hard-copy documents for facility layout drawings which identify plant fire area delineation; areas protected by automatic fire suppression and detection; and locations of fire protection equipment.
2. Licensing Information:
 - a. The facility's 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 licensing correspondence referenced by the SERs;
 - c. All licensing correspondence associated with the comparison to Standard Review Plan (NUREG-0800), Section 9.5.1 or equivalent for licensing purposes;
 - d. Exemptions from 10 CFR 50.48 and 10 CFR Part 50, Appendix R, and associated licensing correspondence;
 - e. The FPP and applicable portions of the USAR, as referenced by the fire protection license condition;
 - f. For pre-1979 plants (i.e., "Appendix R" plants), a listing of all 10 CFR Part 50, Appendix R sections and paragraphs that are applicable to the plant under 10 CFR 50.48(b)(1);
 - g. For pre-1979 plants, all licensing correspondence associated with those sections of 10 CFR Part 50, Appendix R, that are not applicable to the plant under 10 CFR 50.48(b)(1). Specifically, the licensing correspondence associated with those fire protection features proposed or implemented by the licensee that have

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

been accepted by the NRC staff as satisfying the provisions of Appendix A to Branch Technical Position (BTP) APCS 9.5-1 reflected in the NRC fire protection SERs issued before February 19, 1981, (10 CFR 50.48(b)(1)(i)); or those fire protection features, which were accepted by the NRC staff in comprehensive fire protection SERs issued before Appendix A to BTP APCS 9.5-1 was published in August 1976 (10 CFR 50.48(b)(1)(ii));

- h. For post-1979 plants, all licensing correspondence associated with the comparison to Standard Review Plan (NUREG-0800), Section 9.5.1 or equivalent for licensing purposes; and
 - i. For NFPA 805 transition plants provide: (1) all correspondence to and responses from the NRC; (2) a list of all areas showing assessment review status; (3) assessments for all areas that have been completed; and (4) a list of all identified non-conformances, and their respective compensatory measure(s).
3. Fire Protection Program:
- a. If not already provided under request II.(2)(e) above, FPP documents including FHA and post-fire SSA;
 - b. A listing of changes made to the FPP (including associated adverse to SSA) since the last triennial fire protection inspection;
 - c. For pre-1979 plants, 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 as a strategy for each selected fire zone/area;
 - 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. List of plant deviations from code commitments and associated evaluations; and
 - g. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

4. 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, those components used for those areas requiring alternative shutdown capability, and systems relied upon for B.5.b mitigation strategies. These can be of the type that are used for training;
- b. General plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment, and the majority of buildings/areas referenced in B.5.b mitigation strategy documents;
- c. Plant layout drawings which identify the general location of the post-fire emergency lighting units;
- d. One-line schematic drawings of the electrical distribution system for 4160 Volts alternating current (Vac) down to 480Vac;
- e. One-line schematic drawings of the electrical distribution system for 250 Volts direct current (Vdc) and 125Vdc systems as applicable;
- f. Logic diagrams showing the components used to achieve and maintain hot standby and cold shutdown; and
- g. Safe shutdown cable routing database (requested electronically such as on compact disc, if available).

5. Operations Response for Fire Protection:

- a. Pre-fire plans for selected fire zones/areas (**to be determined during information gathering visit**); and
- b. Plant operating procedures which would be used and describe shutdown for a postulated fire in selected fire zones/areas (**to be determined during information gathering visit**).

6. 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.

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

7. 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.

8. B.5.b Mitigating Strategies:

- a. A list of all modifications to regulatory commitments made to meet the requirements of Section B.5.b of the ICM Order, EA-02-026, dated February 25, 2002, the subsequently imposed license conditions, and 10 CFR 50.54(hh)(2);
- b. Copies of procedures/guidelines that were revised or generated to implement the mitigation strategies. These could be extensive damage mitigation guidelines (EDMGs), severe accident management guidelines (SAMGs), emergency operating procedures (EOPs), abnormal operating procedures (AOPs), etc.;
- c.. A matrix that shows the correlation between the mitigation strategies identified in Nuclear Energy Institute 06-12 and the site-specific procedures or guidelines that are used to implement each strategy;
- d. A listing of engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies;
- e. Copies of procedures used to inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies;
- f. A list of B.5.b mitigating strategies, if any, which have implementing details that differ from that documented in the submittals and the safety evaluation report;
- g. Training lesson plans related to B.5.b. mitigating strategies;
- h. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies; and
- i. A list of changes made to B.5.b mitigating strategies and associated procedures since the previous NRC inspection of B.5.b mitigating strategies (December 2008).

9. On-site Discussions:

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

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

- a. Informal discussion on plant procedures operators would use in the event of fire or explosion (including B.5.b mitigation strategies) 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;
- c. Informal discussion on the status of NFPA-805 transition and associated risk insights identified; and
- d. A tour of alternative shutdown and risk significant fire areas.

III. Information Requested to be Available on First Day of the Second On-site Inspection Week (April 26, 2010)

The following information is requested to be provided on the first day of inspection. It is requested that this information be provided on four sets of CDs (searchable, if possible).

1. Program Procedures:
 - a. List of the FPP implementing procedures (e.g., administrative controls, surveillance testing, fire brigade);
 - 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 FPP, 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 50.59

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

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 4160Vac down to 480Vac electrical systems;
 - 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; and
 - g. List of all fire protection or Appendix R calculations.
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.
4. Any updates to information previously provided.

IV. Information Requested to Be Provided Throughout the Inspection

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

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

L. Meyer

-3-

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Sincerely,

/RA/

Robert C. Daley, Chief
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