



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

October 28, 2010

Mr. R. M. Krich
Vice President, Nuclear Licensing
Tennessee Valley Authority
3R Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: SEQUOYAH NUCLEAR PLANT – NOTIFICATION OF CONDUCT OF A
TRIENNIAL FIRE PROTECTION BASELINE INSPECTION (NRC INSPECTION
REPORT NO. 05000327/2011006 AND 05000328/2011006)

Dear Mr. Krich:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region II staff will conduct a triennial fire protection baseline inspection at the Sequoyah Nuclear Plant in January and February 2011. The inspection team will be led by Mr. McKenzie Thomas, NRC Senior Reactor Inspector, of the Region II Office. The team will be composed of personnel from the NRC Region II Office. The inspection will be conducted in accordance with Inspection Procedure 71111.05T, the NRC's triennial fire protection inspection procedure, dated September 30, 2010. The inspection guidance will concentrate on the fire protection program infrastructure and the adequacy of compensatory measures implemented for identified departures from code requirements. Inspection of circuit analysis is included in the inspection procedure.

On October 19, 2010, during a telephone conversation between Ms. Beth Wetzel (Sequoyah Licensing and Industry Affairs Manager) of your staff, and Mr. Thomas, our respective staffs confirmed arrangements for a three-day information gathering onsite visit and a two-week onsite inspection. The schedule for the inspection is as follows:

- Information gathering visit: January 4 - 6, 2011
- Week 1 of onsite inspection: January 24 - 28, 2011
- Week 2 of onsite inspection: February 7 - 11, 2011

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the Sequoyah Nuclear Plant fire protection program, fire protection features, post-fire safe shutdown capabilities, plant layout, and mitigating strategies to address Section B.5.b of the Interim Compensatory Measures Order, EA-02-026, of February 25, 2002/10 CFR 50.54(hh)(2). The types of documents the team will be interested in reviewing, and possibly obtaining, are listed in Enclosures 1 and 2. Please contact Mr. Thomas at (404) 997-4673 prior to preparing copies of the materials listed in the Enclosures. The inspection team will try to minimize your administrative burden by specifically identifying those documents required for inspection preparation.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space; specific documents to be made available to the team in their office space; arrangements for unescorted site access (including radiation protection training, security, safety and fitness for duty requirements); and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Sequoyah Nuclear Plant fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest for the fire protection portion of the inspection are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. For the B.5.b portion of the inspection, those documents implementing your mitigating strategies and demonstrating the management of your commitments for the strategies are of specific interest. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems and features, and the Sequoyah Nuclear Plant fire protection program and its implementation.

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.

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 Mr. Thomas at (404) 997-4673, or me at (404) 997-4530.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures 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/

Rebecca L. Nease, Chief
Engineering Branch 2
Division of Reactor Safety

Docket Nos.: 50-327, 50-328, 72-034
License Nos.: DPR-77, DPR-79

Enclosures: 1. Triennial Fire Protection Inspection Support Documentation
2. Mitigating Strategies Support Documentation

cc w/encls: (See page 3)

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Letter to R. M. Krich from R. Nease dated October 28, 2010.

SUBJECT: SEQUOYAH NUCLEAR PLANT – NOTIFICATION OF CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION (NRC INSPECTION REPORT NO. 05000327/2011006 AND 05000328/2011006)

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DATE	10/28/2010	10/ 28 /2010	10/ 28 /2010	10/ /2010	10/ /2010	10/ /2010	10/
E-MAIL COPY?	YES NO	YES NO	YES NO	YES	YES NO	YES NO	

OFFICIAL RECORD COPY DOCUMENT NAME: S:\DRS\Eng Branch 2\REPORTS\Sequoyah\Sequoyah
2011 TFPI\SEQ 2011006 TFPI Notification Letter.doc

Triennial Fire Protection Inspection Support Documentation

Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit. The current version of these documents is expected unless specified otherwise. Electronic media is preferred, if readily available. (The preferred file format on CD-ROM or DVDROM is “.pdf”). The CD/DVD-ROM should be indexed, hyperlinked, readable, and searchable to facilitate ease of use. Please provide 5 copies of each CD/DVD-ROM submitted). Information in “lists” should contain enough information to be easily understood by someone who has knowledge of the technology. The lead inspector will discuss specific information needs with the licensee staff and may request additional documents or electronic information.

1. The current version of the Fire Protection Program and Fire Hazards Analysis.
2. Corrective Action closeouts as part of operator manual actions corrective actions.
3. List of identified fire-induced circuit failure configurations for select fire areas.
4. Corrective actions for fire-induced circuit failures, both single and multiple spurious actuations for select fire areas.
5. Cable routing for components and equipment credited for safe shutdown for select fire areas.
6. List of protected safe shutdown train equipment for select fire areas.
7. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
8. Fire brigade training program and pre-fire plans.
9. Post-fire safe shutdown systems and separation analysis.
10. Post-fire alternative shutdown analysis.
11. 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.
12. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
13. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
14. Plant layout drawings which identify the general location of the post-fire emergency lighting.

15. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.
16. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
17. Maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
18. A list of significant fire protection and post-fire safe shutdown related design change packages and Generic Letter 86-10 evaluations.
19. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.
21. Organization charts of site personnel down to the level of fire protection staff personnel.
22. If applicable, layout/arrangement drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.
23. 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.).
24. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
25. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.
26. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
27. 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 the previous NRC fire protection triennial inspection.
28. Recent QA surveillances of fire protection activities.
29. A listing of open and closed fire protection problem identification and resolution reports (also known as condition reports/problem evaluation reports/NCRs) since the last triennial inspection.

Mitigating Strategies Support Documentation

Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering visit. The current version of these documents is expected unless specified otherwise. Electronic media is preferred, if readily available. (The preferred file format on CD-ROM or DVDROM is ".pdf"). The CD/DVD-ROM should be indexed, hyperlinked, readable, and searchable to facilitate ease of use. Please provide 5 copies of each CD/DVD-ROM submitted). The lead inspector will discuss specific information needs with the licensee staff and may request additional documents or electronic information.

1. 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).
2. 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.
3. 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.
4. Engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies.
5. Piping and instrumentation diagram (P&ID) or simplified flow diagrams for systems relied upon in the mitigation strategies. These could be the type used for training.
6. A modification package or simplified drawings/descriptions of modifications that were made to plant systems to implement the mitigation strategies.
7. Copies of procedures used to inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies.
8. A list of B.5.b strategies, if any, which have implementing details that differ from that documented in the submittals and the safety evaluation report.
9. A copy of site general arrangement drawing(s) that show the majority of buildings/areas referenced in B.5.b documents.
10. Training records/training matrix/lesson plans related to B.5.b.
11. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies.