



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

November 3, 2010

Rafael Flores, Senior Vice President
and Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
Comanche Peak Nuclear Power Plant
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 –
NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION BASELINE
INSPECTION (NRC INSPECTION REPORT 05000445/2011007;
05000446/2011007) AND REQUEST FOR INFORMATION

Dear Mr. Flores:

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 Comanche Peak Nuclear Power Plant, Units 1 and 2, beginning in January, 2011. 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 71111.05T, "Fire Protection-(Triennial)" dated January 1, 2011.

The schedule for the inspection is as follows:

- Information gathering visit: January 4-5, 2011
- Onsite inspection: January 31 – February 4, 2011
February 14 - 18, 2011

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the fire protection programs, 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). Four inspectors 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, and meet with the key personnel who will support the inspection. The fire area selection will require a walkdown of candidate fire areas in company with key personnel from your staff. The enclosure to this letter provides an initial list of the documents the team will need for their 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.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access; and the availability of knowledgeable plant engineering, operations and licensing organization personnel to serve as points of contact during the inspection.

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 for the fire protection portion of the inspection 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. 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, please ensure the availability of 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.

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.”

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 Sam Graves, the team lead inspector, in the Region IV office at (817) 860-8102, or by email, samuel.graves@nrc.gov.

Sincerely,

/RA/

N. O’Keefe, Chief
Engineering Branch 2
Division of Reactor Safety

Dockets: 50-445; 50-446
Licenses: NPF-87; NPF-89

Enclosure: Triennial Fire Protection
Inspection Documentation Request List

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Glen Rose, TX 76043

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County Judge
P.O. Box 851
Glen Rose, TX 76043

Mr. Richard A. Ratliff, Chief
Bureau of Radiation Control
Texas Department of Health
P.O. Box 149347, Mail Code 2835
Austin, TX 78714-9347

Environmental and Natural
Resources Policy Director
Office of the Governor
P.O. Box 12428
Austin, TX 78711-3189

Honorable Walter Maynard
County Judge
P.O. Box 851
Glen Rose, TX 76043

Mr. Brian Almon
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Luminant Generation Company LLC

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Office of Permitting, Remediation
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- Acting Regional Counsel (David.Roth@nrc.gov)
- Congressional Affairs Officer (Jenny.Weil@nrc.gov)
- OEMail Resource

Inspection Reports/MidCycle and EOC Letters to the following:
ROPreports

Only inspection reports to the following:
OEDO RIV Coordinator (Geoffrey.Miller@nrc.gov)

File located: R:_REACTORS\ CPSES\2011\CP 2011007 TFP RFI-STG MLXXXXXXXXXX

SUNSI Rev Compl.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	GAP
Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	GAP
SRI/DRS/EB2	C:DRS/ EB 2				
SGraves	NOKeefe				
/RA/	/RA/				
10/29/2010	10/29/2010				

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ENCLOSURE

Triennial Fire Protection Inspection Documentation Request

Please provide the following documentation (items 1 – 4) prior to the onsite information-gathering visit, preferably no later than December 20, 2010. Where practical, please provide copies electronically. Please provide an index of the requested documents which includes a brief description of what the document is, and the numerical heading associated with the request (i.e., where it can be found in the list of documents requested).

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. Also, include the results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.

Please provide the following documentation (items 5 – 47) during the information-gathering visit in order to support inspection preparation. Whenever practical, please provide copies electronically. Drawings should be provided as paper copies of sufficient size such that all details are legible.

5. Plant layout and equipment drawings for fire areas 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. The specific documents needed to support inspection preparation will be discussed during the site visit.
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. A list of equipment used to achieve and maintain hot standby and cold shutdown in the event of a fire (safe shutdown equipment lists).
10. 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 reactor coolant system (RCS) makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems.
11. A listing, with descriptions, of design change packages which were determined to impact fire protection and post-fire safe shutdowns, performed since the last triennial fire protection inspection.
12. Copies of fire protection program change evaluations (Generic Letter 86-10 evaluations) performed since the last triennial fire protection inspection.
13. A listing of open and closed corrective action documents initiated since the last triennial fire protection inspection, which relate to the fire protection program or equipment, including corrective actions for fire-induced circuit failures, both single and multiple spurious actuations (for the selected fire areas). Include Corrective Action Process document number, date, and subject.
14. A listing of the applicable codes and standards (with the versions/dates) related to the design of plant fire protection features and evaluations of any code deviations. Copies of these codes should be available for review.
15. Drawings of the portions of the emergency lighting system which support fire response.
16. Procedures used to remove smoke from safety-related areas and the engineering studies or calculations which support the design basis.
17. Drawings of communication systems credited in the license basis for firefighting and plant operations during fires where control room is occupied and/or evacuated.
18. Piping and instrumentation (flow) diagrams for the fire water and sprinkler systems.
19. A listing of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems. Also, include a list of maintenance and surveillance testing procedures which verify fuse and breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
20. Maintenance rule performance criterion, and a summary of the performance history for systems or functions monitored within the maintenance rule program that support the fire protection program or involve safe shutdown equipment, over the period since the last triennial fire protection inspection.

21. 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.
22. 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 the last triennial fire protection inspection.
23. 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 where the action must take place.
24. Corrective action taken or planned associated with NCV 05000445/2009004-05; 05000446/2009004-05.
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 (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 AC and vital DC electrical distribution systems. These should depict how power gets from the switchyard to the engineered safety feature loads (480V and 4160V).
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 February 14, 2011. Please put us in contact, during the onsite information gathering trip, with the appropriate personnel for planning drills.
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 January 31, 2011. Please put us in contact, during the onsite information gathering trip, with the appropriate personnel for planning the walkthrough.

The following documents (items 35 – 48) involve B.5.b mitigating strategies.

35. A copy of the license condition that incorporated the requirements issued to address the requirements of Section B.5.b of the ICM Order, EA-02-026, dated February 25, 2002, and 10 CFR 50.54(hh)(2).
36. 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).
37. A list of procedures/guidelines which 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.
38. 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.
39. A list of engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies.
40. Copies of piping and instrumentation diagrams (P&ID) or simplified flow diagrams for systems relied upon in the mitigation strategies. These could be the type used for training.
41. A list of modification packages and simplified drawings/descriptions of modifications that were made to plant systems to implement the mitigation strategies.
42. Copies of procedure(s) used to inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies.
43. A list of B.5.b strategies, if any, which have implementing details that differ from that documented in the submittals to the NRC and the safety evaluation report.
44. A copy of site general arrangement drawing(s) that show the majority of buildings/areas referenced in B.5.b documents.
45. Training records/ training matrix/ lesson plans related to B.5.b.
46. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies.
47. The team would like to perform a walkthrough of the procedure implementing a sample mitigating strategy (to be selected by the inspector during the information gathering visit) and the inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies during the week of January 31, 2011. Please put us

in contact with the appropriate personnel for planning the walkthrough during the onsite information gathering trip

The following documentation needs (items 48 – 50) will be dependent upon sample selections, and will be finalized during discussions with your staff. Please provide the required documents prior to the week of January 31, 2011. Whenever practical, please provide copies electronically. Drawings should be provided as paper copies of sufficient size such that all details are legible.

48. Pre-fire plans for the selected fire areas (areas to be selected by the team during the information-gathering trip).
49. List of identified fire induced circuit failure configurations (for the selected fire areas) that could prevent operation or cause maloperation of equipment credited for safe shutdown in the event of a fire. Include failure configurations associated with hot shorts, open circuits, or shorts to ground identified as potentially causing spurious or multiple spurious actuations or maloperations of this equipment.
50. Cable routing information for components and equipment, credited for safe shutdown in the selected fire areas. This information request item will be discussed and finalized with your staff during the information gathering visit.