UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

December 8, 2010

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville IL 60555

SUBJECT: CLINTON POWER STATION - NOTIFICATION TO PERFORM A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION; INSPECTION REPORT 05000461/2011009(DRS)

Dear Mr. Pacilio:

On February 16, 2011, the U.S. Nuclear Regulatory Commission (NRC) will begin a triennial fire protection baseline inspection at your Clinton Station. This inspection will be performed in accordance with Inspection Procedure (IP) 71111.05T, the NRC's baseline fire protection inspection procedure.

Based on the latest revision to IP 71111.05T, 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 Section B.5.b requirements review will be performed during the first on-site week of the inspection starting on February 16, 2011. The schedule for the on-site inspection activity is as follows:

- Information Gathering Visit: February 14 – 15, 2011;
- Section B.5.b Requirements: February 16 – 18, 2011; and
- Fire Protection Inspection: February 16 – 18, 2011; February 28 through March 4, 2011; and March 14 – 18, 2011.

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 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 and become familiar with the licensing basis.

It is requested that this information be provided to the lead inspector via U. S. mail or electronically no later than January 31, 2011. 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 that this information be available during the information gathering visit (February 14 – 15, 2011). 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 (February 28, 2011). 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. Z. Falevits. 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) 829-9717 or via e-mail at zelig.falevits@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.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS)

component of NRC's Agencywide Documents Access and Management System (ADAMS), 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. 50-461
License Nos. NPF-62

Enclosure: Fire Protection Inspection Document Request

cc w/encl: Distribution via ListServ

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

Inspection Report: 05000461/2011009(DRS)

On-site Inspection Dates:

February 14 – 15, 2011	(Information Gathering Visit)
February 16 – 18, 2011	(Section B.5.b Requirements)
February 16 – 18, 2011	(Fire Protection Inspection)
February 28 through March 4, 2011	(Fire Protection Inspection)
March 14 – 18, 2011	(Fire Protection Inspection)

Inspection Procedures: IP71111.05T, "Fire Protection (Triennial)"

IP71152, "Identification and Resolution of Problems"

Inspectors:

Z. Falevits, lead
(630) 829-9717
zelig.falevits@nrc.gov

A. K. Dahbur
(630) 829-9810
alan.dahbur@nrc.gov

R. A. Winter
(630) 829-9758
robert.winter@nrc.gov

I. Information Requested Prior To the Information Gathering Visit

The following information is requested by January 31, 2011. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Mr. Z. Falevits (e-mail address zelig.falevits@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 most risk-significant fire areas as determined by probabilistic risk-analyses, if available. Otherwise, the reactor plant's Individual Plant Examination for External Events (IPEEE) for fire and results of any post-IPEEE reviews for fire.
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.
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.

FIRE PROTECTION INSPECTION DOCUMENT REQUESTS

II. Information Requested During the Information Gathering Visit (February 14, 2011)

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 three sets of CDs (searchable, if possible) with the Section B.5.b Mitigating Strategies information (Items 8.a. through 8.h.) provided on separate CDs. In addition, one set of hard copy drawings are requested for Items 3.a. through 3.e.

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; and

   e. For post-1979 plants all licensing correspondence associated with comparison to Standard Review Plan (NUREG-0800), Section 9.5.1 or equivalent for licensing purposes.

3. Fire Protection Program:

   a. A listing of changes made to the FPP since the last triennial fire protection inspection;

   b. A list of Generic Letter 86-10 evaluations (i.e., a list of adverse to safe-shutdown evaluations);

   c. 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); and

   d. List of plant deviations from code commitments and associated evaluations.

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 Section B.5.b Mitigation Strategies. These can be of the type that are used for training;

    b. One-line schematic drawings of the electrical distribution system for 4160 Volts alternating current (Vac) down to 480Vac;

    c. One-line schematic drawings of the electrical distribution system for 250 Volts direct current (Vdc) and 125Vdc systems as applicable;

    d. Logic diagrams showing the components used to achieve and maintain hot standby and cold shutdown; and

    e. 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**);

    b. Plant operating procedures which specify the initial operations response to a fire alarm or annunciator; and

    c. Procedure for calling out the fire brigade and requesting off-site assistance.

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. List of current fire impairments, including duration.

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. Section 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 Section 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. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies; and

   h. A list of changes made to Section B.5.b mitigating strategies and associated procedures since the previous NRC inspection of Section B.5.b mitigating strategies, if applicable, (June 18, 2008).

9. 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 or explosion (including Section 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; and

   c. 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 (February 28, 2011)

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

1. Program Procedures:

   a. Procedures for:

      - Administrative controls (such as allowed out of service times and compensatory measures) for fire protection systems and components;
      - Control of transient combustibles; and
      - Control of hot work.

   b. List of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps, and suppression systems; and

   c. List of maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.

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 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; and

   f. List of all fire protection or Appendix R calculations.

3. Assessment and Corrective Actions:

   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.

component of NRC's Agencywide Documents Access and Management System (ADAMS), 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. 50-461
License Nos. NPF-62

Enclosure: Fire Protection Inspection Document Request

cc w/encl: Distribution via ListServ

DISTRIBUTION:
Daniel Merzke
RidsNrrDorlLpl3-2 Resource
RidsNrrPMClinton Resource
RidsNrrDirsIrib Resource
Cynthia Pederson
Steven Orth
Jared Heck
Allan Barker
Carole Ariano
Linda Linn
DRSIII
DRPIII
Patricia Buckley
Tammy Tomczak
ROPreports Resource

DOCUMENT NAME: G:\DRSIII\DRS\Work in Progress\-Ltr 120610 Clinton Fire Protection RFI -ZXF.docx
□ Publicly Available □ Non-Publicly Available □ Sensitive □ Non-Sensitive
To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl; "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII		RIII					
NAME	ZFalevits:ls		RCDaley					
DATE	12/06/10		12/08/10					

OFFICIAL RECORD COPY