



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
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LISLE, IL 60532-4352

June 7, 2011

Mr. Jack M. Davis
Senior Vice President and
Chief Nuclear Officer
Detroit Edison Company
Fermi 2 - 210 NOC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI POWER PLANT, UNIT 2
TRIENNIAL FIRE PROTECTION INSPECTION REPORT
05000341/2011009

Dear Mr. Davis:

On April 29, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed a triennial fire protection inspection at your Fermi Power Plant, Unit 2. The enclosed inspection report documents the inspection results, which were discussed on April 29, 2011, with Mr. J. Plona and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, three NRC-identified findings of very low safety significance were identified. The findings involved violations of NRC requirements. However, because of their very low safety significance, and because the issues were entered into your corrective action program, the NRC is treating the issues as a Non-Cited Violations (NCVs) in accordance with Section 2.3.2 of the NRC Enforcement Policy.

If you contest the subject or severity of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission – Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at Fermi Power Plant. In addition, if you disagree with the cross-cutting aspect assigned to any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at Fermi Power Plant.

J. Davis

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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 No. 50-341
License No. NPF-43

Enclosures: Inspection Report 05000341/2011009(DRS)
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-341

License No: NPF-43

Report No: 05000341/2011-009(DRS)

Licensee: Detroit Edison Company

Facility: Fermi Power Plant, Unit 2

Location: Newport, MI

Dates: March 22 through April 29, 2011

Inspectors: R. Langstaff, Senior Reactor Inspector, Lead
G. Hausman, Senior Reactor Inspector
D. Szwarc, Reactor Inspector
N. Valos, Senior Reactor Analyst

Approved by: R. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000341/2011009(DRS); 03/22/2011 – 04/29/2011; Fermi Power Plant, Unit 2; Routine Triennial Fire Protection Baseline Inspection.

This report covers an announced triennial fire protection baseline inspection. The inspection was conducted by Region III inspectors. Three (Green) findings were identified by the inspectors. The findings were considered Non-Cited Violations (NCVs) of Nuclear Regulatory Commission (NRC) regulations. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be (Green) or be assigned a severity level after NRC management review. The cross-cutting aspects were determined using IMC 0310, "Components Within the Cross-Cutting Areas." The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Initiating Events

- Green. The inspectors identified a finding of very low safety significance (Green) and associated NCV of License Condition 2.C(9) for the licensee's failure to control transient combustibles in accordance with the fire protection program requirements. Specifically, the inspectors determined that the licensee stored combustible materials in an area containing safety-related equipment without evaluating the location or obtaining a transient combustible permit as required by procedure. Upon discovery, the licensee removed the transient combustibles and placed the issue into their corrective action program.

The inspectors determined that this finding was more than minor because the transient combustibles were stored directly under safety-related cables and formed a credible fire scenario. This finding was of very low safety significance because the materials would not result in ignition of a fire from existing sources of heat or electrical energy. The finding has a cross-cutting aspect in the area of Human Performance, because the licensee did not appropriately plan work activities by incorporating job-site conditions that may impact plant structures, systems, and components. [H.3(a)] (Section 1R05.1.b)

Cornerstone: Mitigating Systems

- Green. The inspectors identified a finding of very low safety significance (Green) and associated NCV of License Condition 2.C(9) for the licensee's failure to install heat detectors at the ceiling in the emergency diesel generator (EDG) rooms. Specifically, the licensee failed to install heat detectors at the ceiling level of the open grated areas directly above each of the four EDGs. The licensee entered the issue into their corrective action program, declared the carbon dioxide (CO₂) suppression systems associated with the heat detectors inoperable, and established an hourly fire watch as a compensatory measure.

The inspectors determined that this finding was more than minor because the lack of heat detectors in the ventilation corridors above the EDGs resulted in a reasonable

doubt with respect to the functionality of the CO₂ suppression systems in the EDG rooms. This finding was of very low safety significance because a fire would only affect the EDG in that room. This finding does not have a cross-cutting aspect because the finding is not representative of current performance. (Section 1R05.3.b)

- Green. The inspectors identified a finding of very low safety significance (Green) and associated NCV of License Condition 2.C(9) for the failure to implement procedures which would ensure that reactor vessel water level would be maintained above the top of the core in the event of a fire. Specifically, procedure deficiencies could have resulted in delays in restoring make-up to the reactor vessel causing reactor vessel water level to lower more than the level assumed in the accident analyses. The licensee placed the issue into their corrective action program and revised procedures to address identified deficiencies.

The inspectors determined that this finding was more than minor because the failure to ensure that water level would be maintained above the top of the core affected the cornerstone objective of ensuring the reliability and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The finding was of very low safety significance because sufficient margin still existed to prevent core damage. This finding has a cross-cutting aspect in the area of Human Performance because procedures did not provide guidance on which operators should be used to fulfill safe shutdown roles. [H.2(c)] (Section 1R05.5.b)

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events and Mitigating Systems

1R05 Fire Protection (71111.05T)

The purpose of the fire protection triennial baseline inspection was to conduct a design based, plant specific, risk-informed, onsite inspection of the licensee's fire protection program's defense-in-depth elements used to mitigate the consequences of a fire. The fire protection program shall extend the concept of defense-in-depth to fire protection in plant areas important to safety by:

- preventing fires from starting;
- rapidly detecting, controlling and extinguishing fires that do occur;
- providing protection for structures, systems, and components important to safety so that a fire that is not promptly extinguished by fire suppression activities will not prevent the safe shutdown of the reactor plant; and
- taking reasonable actions to mitigate postulated events that could potentially cause loss of large areas of power reactor facilities due to explosions or fires.

The inspectors' evaluation focused on the design, operational status, and material condition of the reactor plant's fire protection program, post-fire safe shutdown systems and B.5.b mitigating strategies. The objectives of the inspection were to assess whether the licensee had implemented a fire protection program that: (1) provided adequate controls for combustibles and ignition sources inside the plant; (2) provided adequate fire detection and suppression capability; (3) maintained passive fire protection features in good material condition; (4) established adequate compensatory measures for out-of-service, degraded, or inoperable fire protection equipment, systems or features; (5) ensured that procedures, equipment, fire barriers, and systems exist so that the post-fire capability to safely shut down the plant was ensured; (6) included feasible and reliable operator manual actions when appropriate to achieve safe shutdown; and (7) identified fire protection issues at an appropriate threshold and ensured these issues were entered into the licensee's problem identification and resolution program.

In addition, the inspectors' review and assessment focused on the licensee's post-fire safe shutdown systems for selected risk-significant fire areas. Inspector emphasis was placed on determining that the post-fire safe shutdown capability and the fire protection features were maintained free of fire damage to ensure that at least one post-fire safe shutdown success path was available. The inspectors' review and assessment also focused on the licensee's B.5.b related license conditions and the requirements of 10 CFR 50.54(hh)(2). Inspector emphasis was to ensure that the licensee could maintain or restore core cooling, containment, and spent fuel pool cooling capabilities utilizing the B.5.b mitigating strategies following a loss of large areas of power reactor facilities due to explosions or fires. Documents reviewed are listed in the Attachment to this report.

The fire zones and B.5.b mitigating strategies selected for review during this inspection are listed below and in Section 1R05.11. The fire zones and B.5.b mitigating strategies selected constitute four inspection samples each, respectively, as defined in Inspection Procedure 71111.05T.

<u>Fire Zone</u>	<u>Description</u>
04RB	Corridor Area
08AB	Cable Tray Area
12AB	Division II Switchgear
RHRN	Division II RHR Complex

.1 Protection of Safe Shutdown Capabilities

a. Inspection Scope

For each of the selected fire areas, the inspectors reviewed the fire hazards analysis, safe shutdown analysis, and supporting drawings and documentation to verify that safe shutdown capabilities were properly protected.

The inspectors reviewed the licensee procedures and programs for the control of ignition sources and transient combustibles to assess their effectiveness in preventing fires and in controlling combustible loading within limits established in the fire hazards analysis. The inspectors performed plant walkdowns to verify that protective features were being properly maintained and administrative controls were being implemented.

The inspectors also reviewed the licensee's design control procedures to ensure that the process included appropriate reviews and controls to assess plant changes for any potential adverse impact on the fire protection program and/or post-fire safe shutdown analysis and procedures.

b. Findings

Unauthorized Transient Combustibles

Introduction: The inspectors identified a finding of very low safety significance (Green) and associated Non-Cited Violation (NCV) of License Condition 2.C(9) for the licensee's failure to control transient combustibles in accordance with the fire protection program requirements. Specifically, the licensee failed to evaluate the amount and location of transient combustibles staged in an area containing safety-related components and to obtain a transient combustible permit as required by the fire protection program.

Description: On March 22, 2011, the inspectors identified an equipment cart stored directly below safety-related cables in the direct current (DC) Motor Control Center (MCC) area of the auxiliary building. Specifically, the equipment cart was located under the Division 2 safety-related cable trays 2C-075 and 2P-075. The cart was staged in the area in support of Work Order 30168382 and contained Class A combustibles, which

included a large quantity of electrical cables and a number of large battery cells on a plastic cart. National Fire Protection Association (NFPA) 10, "Standard for Portable Fire Extinguishers," defines Class A fires as fires in ordinary combustible materials, such as wood, cloth, paper, rubber, and many plastics.

Enclosure D, "Combustible Controls, Safe Shutdown Areas," of Procedure MOP11, "Operations Conduct Manual – Fire Protection," Revision 15 outlined the procedural requirements for control of transient combustibles. Enclosure D required that transient combustible permits be processed for staging of materials above minor combustible levels. Enclosure D listed the minor combustible level for the DC MCC area as 88 pounds. The quantity of transient combustibles exceeded the minor combustibles level of 88 pounds and the licensee did not complete a transient combustible review as required. The inspectors also noted that the equipment cart should have been stored in a different portion of the room away from safety-related cables and equipment. The licensee was required by Section 4.7.4 of MOP11 to review the location of combustible material stored in relation to safety-related equipment, cable trays, and/or Division 1 and 2 conduits.

Upon discovery, the licensee removed the transient combustibles and placed the issue into their corrective action program as Condition Assessment Resolution Document (CARD) 11-23024, "2011 TFPI – Improper Staging of Combustibles."

Analysis: The inspectors determined that the failure to control transient combustibles was contrary to the licensee's fire protection program and was a performance deficiency. Specifically, the inspectors determined that the licensee stored Class A combustible materials in an area containing safety-related equipment without evaluating the location or obtaining a transient combustible permit as required by Procedure MOP11.

The finding was determined to be more than minor because the transient combustibles were not reflected in the fire hazards analysis and the licensee failed to evaluate the material as required by the fire protection program procedures. Therefore this performance deficiency impacted the Initiating Events cornerstone attribute of Protection Against External Factors (Fire) and affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during plant operations. In addition, the finding was similar to Inspection Manual Chapter (IMC) 0612, Appendix E, Example 4.k. The Class A transient combustible materials stored directly under safety-related cables formed a credible fire scenario.

In accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase I - Initial Screening and Characterization of Findings," Table 3b the inspectors determined the finding degraded the fire protection defense-in-depth strategies. Therefore, screening under IMC 0609, Appendix F, "Fire Protection Significance Determination Process," was required. The inspectors completed a significance determination of this issue using IMC 0609, Appendix F, Attachment 2, "Degradation Rating Guidance Specific to Various Fire Protection Program Elements," dated February 28, 2005. The inspectors determined that the quantity of Class A combustible materials stored represented a low degradation against the combustible controls program because the materials would not result in ignition of a fire from existing sources of heat or electrical energy. The inspectors determined that the finding

screened as having very low safety significance (Green) in Task 1.3.1 of IMC 0609, Appendix F.

This finding has a cross-cutting aspect in the area of Human Performance within the work control component because the licensee did not plan and coordinate work activities, consistent with nuclear safety. Specifically, the licensee did not appropriately plan work activities by incorporating job-site conditions that may impact plant structures, systems, and components. [H.3(a)]

Enforcement: License Condition 2.C(9) required the licensee to implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report (FSAR) through Amendment 60 and as approved in Safety Evaluation Reports through Supplement 5. Section 9A.1.3.2 of the Updated Final Safety Analysis Report (UFSAR) stated that the fire protection program consists of, “administrative controls to minimize the amount of combustibles that safety-related areas may be exposed to...” Enclosure D of Procedure MOP11, “Operations Conduct Manual – Fire Protection,” Revision 15 provided the required administrative controls by outlining the procedural requirements for control of transient combustibles. Enclosure D required that transient combustible permits be processed for staging of materials above minor combustible levels. Enclosure D listed the minor combustible level for the DC MCC area as 88 pounds.

Contrary to the above, on March 22, 2011, the inspectors identified staged transient combustibles in excess of minor combustible levels for which the licensee failed to process a transient combustible permit. Specifically, the inspectors identified an equipment cart with combustibles in excess of the specified minor combustible level of 88 pounds in the DC MCC area for which no transient combustible permit had been processed.

Because this violation was of very low safety significance, it was entered into the licensee’s corrective action program as CARD 11-23024, and the transient combustibles were removed from the area, this violation is being treated as a NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000341/2011009-01, Unauthorized Transient Combustibles).

.2 Passive Fire Protection

a. Inspection Scope

For the selected fire areas, the inspectors evaluated the adequacy of fire area barriers, penetration seals, fire doors, electrical raceway fire barriers, and fire rated electrical cables. The inspectors observed the material condition and configuration of the installed barriers, seals, doors, and cables. The inspectors reviewed approved construction details. In addition, the inspectors reviewed license documentation, such as NRC safety evaluation reports, and deviations from NRC regulations and the NFPA standards to verify that fire protection features met license commitments.

The inspectors walked down accessible portions of the selected fire areas to observe material condition and the adequacy of design of fire area boundaries (including walls,

fire doors, and fire dampers) to ensure they were appropriate for the fire hazards in the area.

b. Findings

No findings of significance were identified.

.3 Active Fire Protection

a. Inspection Scope

For the selected fire areas, the inspectors evaluated the adequacy of fire suppression and detection systems. The inspectors observed the material condition and configuration of the installed fire detection and suppression systems. The inspectors reviewed design documents and supporting calculations. In addition, the inspectors reviewed license basis documentation, such as, NRC safety evaluation reports, deviations from NRC regulations, and NFPA standards to verify that fire suppression and detection systems met license commitments.

b. Findings

Inadequate Detection in Emergency Diesel Generator Rooms

Introduction: The inspectors identified a finding of very low safety significance (Green) and associated Non-Cited Violation of License Condition 2.C(9) for the licensee's failure to install heat detectors in the emergency diesel generator (EDG) rooms, in accordance with NFPA 72E, "Standard on Automatic Fire Detectors" requirements. Specifically, the licensee failed to install heat detectors at the ceiling level above open grated areas directly above each of the four EDGs.

Description: Fermi Power Plant, Unit 2 has four EDGs (two for each division) located in separate rooms in the residual heat removal complex. Each room is separated from other rooms with three-hour rated fire barriers. The licensee relied on a carbon dioxide (CO₂) suppression system in each of the EDG rooms to suppress a fire. The CO₂ system was actuated by ceiling mounted heat detectors with a set point of 225 degrees Fahrenheit (°F). Directly above the EDGs in each room there was a corridor between the EDG ventilation equipment room and the switchgear ventilation room with an open grated floor. The size of this grated floor was 20.5 feet by 8.5 feet. This surface was grated to allow a 2,500 cubic foot per minute ventilation flow path from the EDG room. No heat detectors were mounted on the ceiling in this area.

Section 9A.2.3.5.1 of the UFSAR stated that the licensee had performed an evaluation of the fire detection system to verify installation with NFPA 72E, "Automatic Fire Detectors." Standard NFPA 72E required that spot-type heat detectors be located at the ceiling. The 1974 edition of NFPA 72E defined a ceiling as, "the upper surface of a space, regardless of height." Therefore, the inspectors concluded that the ceiling in the corridors above the EDGs should have contained heat detectors because air could move freely through the grated floor in those areas from the EDGs rooms below.

The inspectors were concerned that a substantial part of the fire plume could be drawn into the open grating in the lower ceilings (i.e., the ceilings of the EDG rooms) thereby preventing a ceiling jet of sufficient temperature from coming in contact with one of the heat detectors installed at the lower ceiling level. Additionally, the inspectors were concerned that a hot gas layer of sufficient temperature would not form at the lower ceiling level due to the open grating. During operation of the EDGs, the ventilation systems would be operating and would further pull the hot gases away from the lower ceilings thereby preventing development of a substantive hot gas layer. These aspects of the configuration in the EDG rooms would result in significantly delaying and potentially preventing actuation of the EDG room CO₂ suppression systems in the event of a fire.

The inspectors discussed these concerns with the licensee who then initiated CARD 11-23943, "2011 TFPI – NRC Question Regarding EDG CO₂ Heat Detection," to address these concerns. The licensee declared the CO₂ suppression systems inoperable for the four EDG rooms per Technical Requirements Manual (TRM) 3.12.1 B.1 and established an hourly fire watch.

Analysis: The inspectors determined that the licensee's failure to install heat detectors at the ceiling in the EDG rooms was contrary to NFPA 72E requirements and was a performance deficiency. The finding was determined to be more than minor because the finding was associated with the Mitigating Systems cornerstone attribute of Protection Against External Factors (Fire) and affected the cornerstone objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the inspectors did not have reasonable assurance that the CO₂ suppression systems in the EDG rooms were functional due to the lack of heat detectors in the ventilation corridors above the EDGs.

In accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase I - Initial Screening and Characterization of Findings," Table 3b the inspectors determined the finding degraded the fire protection defense-in-depth strategies. Therefore, screening under IMC 0609, Appendix F, "Fire Protection Significance Determination Process," was required. The inspectors assigned a high degradation rating to the finding during the Phase I analysis because there was reasonable doubt as to whether the CO₂ suppression system would function in the event of a fire. No other equipment would be affected. Therefore, screening the finding through Phase II of the SDP was required. A fire in any one of the four EDG rooms would only affect the EDG in that room and would not affect the opposite division equipment or cables as the rooms were separated from other areas by three-hour rated fire barriers. The inspectors determined that the damage from a potential fire in an EDG room would be equivalent to a Fire Damage State of FDS0 as described in Step 2.2 of IMC 0609, Appendix F. The inspectors screened the finding to (Green) because FDS0 scenarios are not analyzed in the fire protection SDP as risk contributors. Therefore, the finding was determined to be of very low safety significance (Green).

The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not representative of current performance.

Enforcement: License Condition 2.C(9) required the licensee to implement and maintain in effect all provisions of the approved fire protection program as described in the FSAR

through Amendment 60 and as approved in Safety Evaluation Reports through Supplement 5. Section 9A.2.3.5.1 of the UFSAR stated that the licensee had performed an evaluation of the fire detection system to verify installation with NFPA 72E.

Contrary to the above, from the date of original construction to April 29, 2011, the licensee failed to install the heat detectors in the EDG rooms in accordance with NFPA 72E requirements. Specifically, the licensee failed to install heat detectors at the ceiling of the open area above the EDGs.

Because this violation was of very low safety significance and it was entered into the licensee's corrective action program as CARD 11-23943, this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000341/2011009-02, Inadequate Detection in Emergency Diesel Generator Rooms).

.4 Protection from Damage from Fire Suppression Activities

a. Inspection Scope

For the selected fire areas, the inspectors verified that redundant trains of systems required for hot shutdown would not be subject to damage from fire suppression activities or from the rupture or inadvertent operation of fire suppression systems including the effects of flooding. The inspectors conducted walkdowns of each of the selected fire areas to assess conditions such as the adequacy and condition of floor drains, equipment elevations, and spray protection.

b. Findings

No findings of significance were identified.

.5 Alternative Shutdown Capability

a. Inspection Scope

The inspectors reviewed the licensee's systems required to achieve alternative safe shutdown to determine if the licensee had properly identified the components and systems necessary to achieve and maintain safe shutdown conditions. The inspectors also focused on the adequacy of the systems to perform reactor pressure control, reactivity control, reactor coolant makeup, decay heat removal, process monitoring, and support system functions.

The inspectors conducted selected area walkdowns to determine if operators could reasonably be expected to perform the alternate safe shutdown procedure actions and that equipment labeling was consistent with the alternate safe shutdown procedure. The review also looked at operator training, as well as consistency between the operations shutdown procedures and any associated administrative controls.

b. Findings

Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel

Introduction: The inspectors identified a finding of very low safety significance (Green) and associated Non-Cited Violation of License Condition 2.C(9) for the failure to implement procedures, which would ensure that reactor vessel water level would be maintained above the top of the core in the event of a fire. Specifically, procedure deficiencies could have resulted in delays in restoring make-up to the reactor vessel causing reactor vessel water level to lower more than the level assumed in the accident analyses.

Description: Procedure 20.000.18, "Control of the Plant from the Dedicated Shutdown Panel," was the procedure for performing a safe shutdown in the event of a fire in the control room and other alternative shutdown areas such as the relay room. Revision 45 was in effect at the time the resident inspectors performed walkdowns of the procedure on August 11 and August 13, 2010.

Procedure MOP03, "Operations Conduct Manual; Policies and Practices," specified minimum operating shift staffing. Revision 28 of MOP03 was in effect in August 2010. Procedure MOP03 specified that one licensed reactor operator and one non-licensed operator were to be available for safe shutdown functions. The licensed reactor operator for safe shutdown functions was one of the two licensed reactor operators assigned to the control room. Procedure MOP03 did not specify which non-licensed operator was to be used for providing the safe shutdown function. Based on interviews with operating crews in August 2010 the resident inspectors determined that the outside rounds operator would be responsible for safe shutdown functions. Additionally, the licensee confirmed that most operators believed that the outside rounds operator would be responsible for safe shutdown functions. Calculation DC-6197, "SRV Blowdown Analyses to Support 10 CFR Part 50 Appendix R Compliance," original revision, determined that make-up to the reactor vessel needed to be restored within 29 minutes to prevent the water level from dropping below the top of active fuel. The resident inspectors determined that the Procedure 20.000.18 validation, documented in evaluation FPEE-05-0012, "Manual Action Feasibility Study for AOP 20.000.18 Revision 36," based the validation timing on the non-licensed operator leaving from the control room versus a location outside the plant. In response to the issues raised by the resident inspectors, the licensee determined that the potential delay for an outside rounds operator to travel to the dedicated shutdown panel was 7 minutes and 22 seconds, which would have been in addition to the 25 minute and 15 second time determined by evaluation FPEE-05-0012 for restoring make-up to the reactor vessel for a total of approximately 33 minutes. The inspectors concluded that although operators other than the outside rounds operator could have performed safe shutdown functions, there was no assurance that another operator would perform safe shutdown functions versus performing other activities such as remaining in the control room. In addition, it was subsequently determined that some changes in work practices, such as requiring operators to don protective clothing when operating high voltage switchgear, would result in additional delays.

Subsequent to the timing issues being identified by the resident inspectors, the licensee revised Procedure ODE-9, "Operations Department Expectation; Manpower

Scheduling,” on October 22, 2010, to explicitly state that the outside rounds operator should not be the designated individual for performing safe shutdown functions. During March 2011 the licensee performed another procedure validation effort. However, the inspectors identified a number of issues associated with the March 2011 validation effort (e. g., quality of documentation and discrepancies in the number of operators used). The licensee initiated CARD 11-24345, “2011 TFPI NRC Concern: 20.000.18 performance at minimum staffing investigation,” to address the issues raised by the inspectors.

Analysis: The inspectors determined that the failure to implement procedures, which would ensure that reactor vessel water level would be maintained above the top of the core in the event of a fire was contrary to 10 CFR Part 50, Appendix R, Section III.L and was a performance deficiency.

The finding was determined to be more than minor because the failure to implement procedures, which would ensure that water level would be maintained above the top of the core was associated with the Mitigating Systems cornerstone attribute of Protection Against External Factors (Fire) and affected the cornerstone objective of ensuring the reliability and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, procedure deficiencies could have resulted in delays in restoring make-up to the reactor vessel causing reactor vessel water level to lower more than the level assumed in the accident analyses.

In accordance with IMC 0609, “Significance Determination Process,” Attachment 0609.04, “Phase 1 - Initial Screening and Characterization of Findings,” Table 3b the inspectors determined the finding degraded the fire protection defense-in-depth strategies. Therefore, screening under IMC 0609, Appendix F, “Fire Protection Significance Determination Process,” was required.

The inspectors determined that the finding affected the post-fire safe shutdown finding category. The inspectors determined that the finding represented a low degradation because the delays due to the procedure deficiencies would not have resulted in core damage. Specifically, core damage would not occur until water level was below two-thirds core height which was lower than the top of core height assumed in the accident analyses as required by 10 CFR Part 50, Appendix R, Section III.L. Site probabilistic risk analysts stated that core damage would not occur until water level was substantially lower than two-thirds core height. As such, the inspectors determined that although water level may have dropped below top of core height, sufficient margin existed to prevent core damage and the finding represented a low degradation. Based on Task 1.3.1, “Qualitative Screening for All Finding Categories,” Question 1, the finding screened to (Green) (i.e., very low safety significance).

This finding has a cross-cutting aspect in the area of Human Performance, resources, because the licensee did not provide complete, accurate, and up-to-date procedures. Specifically, licensee procedures did not provide guidance on which operators should be used to fulfill safe shutdown roles. As a result, delays in implementing safe shutdown procedures could have occurred. [H.2.c]

Enforcement: License Condition 2.C(9) required the licensee to implement and maintain in effect all provisions of the approved fire protection program as described in the FSAR and as approved through Safety Evaluation Reports through Supplement No. 5.

Section 9A.3 of the UFSAR stated that for fires occurring in one of the dedicated shutdown areas of concern, safe shutdown would be accomplished from outside the main control room using the alternative shutdown system (including the dedicated shutdown panel) in accordance with the technical requirements of Sections III.G.3 and III.L of 10 CFR Part 50, Appendix R. Section III.L of 10 CFR Part 50, Appendix R specifies that alternative dedicated shutdown capability provided for a specific fire area shall be able to maintain reactor coolant inventory. Section III.L of Appendix R establishes as a performance goal for the shutdown function that the reactor coolant makeup function shall be capable of maintaining the reactor coolant level above the top of the core for boiling water reactors. Section III.L of Appendix R specifies that procedures be in effect to implement this shutdown capability. Calculation DC-6197 established that make-up to the reactor vessel needed to be restored within a maximum of 29 minutes to prevent the water level from dropping below the top of the core for fires in dedicated shutdown areas.

Contrary to the above, from August 11, 2010 through October 22, 2010, the licensee failed to provide procedures to implement shutdown capability to maintain the reactor coolant level above the top of the core. Specifically, licensee procedures failed to designate the operator position which would fulfill a dedicated shutdown position in the event of a fire in a dedicated shutdown area. As a result, delays in implementing the dedicated shutdown procedure could have occurred, which would have resulted in failing to maintain the reactor coolant level above the top of the core.

Because this violation was of very low safety significance, it was entered into the licensee's corrective action program as CARD 10-27645, "NRC Concern: Issues with 20.000.18," and procedure deficiencies were corrected, this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000341/2011009-03, Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel).

.6 Circuit Analyses

a. Inspection Scope

The inspectors reviewed the licensee's post-fire safe shutdown analysis to verify that the licensee had identified both required and associated circuits that may impact safe shutdown. On a sample basis, the inspectors verified that the cables of equipment required achieving and maintaining hot shutdown conditions, in the event of fire in the selected fire zones, had been properly identified. In addition, the inspectors verified that these cables had either been adequately protected from the potentially adverse effects of fire damage, mitigated with approved manual operator actions, or analyzed to show that fire-induced faults (e.g., hot shorts, open circuits, and shorts to ground) would not prevent safe shutdown. In order to accomplish this, the inspectors reviewed electrical schematics and cable routing data for power and control cables associated with each of the selected components.

In addition, the adequacy of circuit protective coordination for the safe shutdown systems' electrical power and instrumentation busses was evaluated. The inspectors also evaluated cable trays that contained both safe shutdown and non-safe shutdown

cables for proper circuit protection to ensure that cables were protected by a proper protective device in order to preclude common enclosure concerns.

b. Findings

No findings of significance were identified.

.7 Communications

a. Inspection Scope

The inspectors reviewed, on a sample basis, the adequacy of the communication system to support plant personnel in the performance of alternative safe shutdown functions and fire brigade duties. The inspectors verified that plant telephones, page systems, sound powered phones, and radios were available for use and maintained in working order. The inspectors reviewed the electrical power supplies and cable routing for these systems to verify that either the telephones or the radios would remain functional following a fire.

b. Findings

No findings of significance were identified.

.8 Emergency Lighting

a. Inspection Scope

The inspectors performed a plant walkdown of selected areas in which a sample of operator actions would be performed in the performance of alternative safe shutdown functions. As part of the walkdown, the inspectors focused on the existence of sufficient emergency lighting for access and egress to areas and for performing necessary equipment operations. The locations and positioning of the emergency lights were observed during the walkdown and during review of manual actions implemented for the selected fire areas.

b. Findings

No findings of significance were identified.

.9 Cold Shutdown Repairs

a. Inspection Scope

The inspectors reviewed the licensee's procedures to determine whether repairs were required to achieve cold shutdown and to verify that dedicated repair procedures, equipment, and material to accomplish those repairs were available onsite. The inspectors also evaluated whether cold shutdown could be achieved within the required time using the licensee's procedures and repair methods. The inspectors also verified that equipment necessary to perform cold shutdown repairs was available onsite and properly staged.

b. Findings

No findings of significance were identified.

.10 Compensatory Measures

a. Inspection Scope

The inspectors conducted a review to verify that compensatory measures were in place for out-of-service, degraded or inoperable fire protection and post-fire safe shutdown equipment, systems, or features (e.g., detection and suppression systems, and equipment, passive fire barriers, pumps, valves or electrical devices providing safe shutdown functions or capabilities). The inspectors also conducted a review on the adequacy of short term compensatory measures to compensate for a degraded function or feature until appropriate corrective actions were taken.

b. Findings

No findings of significance were identified.

.11 B.5.b Inspection Activities

a. Inspection Scope

The inspectors reviewed the licensee's preparedness to handle large fires or explosions by reviewing mitigating strategies identified below. This review ensured that the licensee continued to meet the requirements of their B.5.b related license conditions and 10 CFR 50.54(hh)(2) by determining that:

- Procedures were being maintained and adequate;
- Equipment was properly staged, maintained, and tested;
- Station personnel were knowledgeable and could implement the procedures; and
- Additionally, inspectors reviewed the storage, maintenance, and testing of B.5.b related equipment.

The inspectors reviewed the licensee's B.5.b related license conditions and evaluated selected mitigating strategies to ensure they remain feasible in light of operator training, maintenance/testing of necessary equipment and any plant modifications. In addition, the inspectors reviewed previous inspection reports for commitments made by the licensee to correct deficiencies identified during performance of Temporary Instruction (TI) 2515/171 or subsequent performances of these inspections.

The B.5.b mitigating strategies selected for review during this inspection are listed below. The off-site and onsite communications, notifications/emergency response organization activation, initial operational response actions, and damage assessment activities identified in Table A.3-1 of Nuclear Energy Institute (NEI) 06-12, "B.5.b Phase II and III Submittal Guidance," Revision 2 are evaluated each time due to the mitigation strategies' scenario selected.

NEI 06-12, Revision 2 Section	Licensee Strategy (Table)
2.2	SFP Internal Makeup (Table A.2-1)
2.3.1	SFP External Makeup (Table A.2-2)
2.3.2	SFP External Spray (Table A.2-3)
3.4.2	DC Power Supply to Depressurize RPV and Inject with Portable Pump (Table A.5-2)

b. Findings

One finding was identified which is discussed in Inspection Report 05000341/2011012(DRS).

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution (71152)

a. Inspection Scope

The inspectors reviewed the licensee's corrective action program procedures and samples of corrective action documents to verify that the licensee was identifying issues related to the fire protection program at an appropriate threshold and entering them in the corrective action program. The inspectors reviewed selected samples of condition reports, design packages, and fire protection system non-conformance documents.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 (Closed) Unresolved Item 05000341/2010-004-01, Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel

The adequacy of Procedure 20.000.18 was questioned due to operations manning issues. The inspectors reviewed this issue and identified a violation of NRC requirements. This issue is discussed in Section 1R05.5.b(1) of this report. This item is closed.

4OA6 Management Meetings

.1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. J. Plona and to other members of the licensee staff on April 29, 2011. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

J. Plona, Site Vice-President
K. Amin, Lead Engineer, Plant Support Engineering
S. Berry, Manager, Systems Engineering
T. Conner, Plant Manager
J. Dudlets, Supervisor, Plant Support Engineering
P. Fallon, Operations
R. Harris, Plant Support Engineering
B. Keck, Manager, Design Engineering
K. McMahon, Supervisor, Operations
C. Redmond, Plant Support Engineering
P. Rick, Plant Support Engineering
R. Salmon, Supervisor, Licensing
K. Scott, Sr. Manager, Engineering
G. Strubel, Manager, Operations
K. Thomas, Plant Support Engineering

Nuclear Regulatory Commission

R. Daley, Branch Chief, Engineering Branch 3
R. Morris, Senior Resident Inspector
R. Jones, Resident Inspector

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

05000341/2011009-01	NCV	Unauthorized Transient Combustibles (Section 1R05.1.b)
05000341/2011009-02	NCV	Inadequate Detection in Emergency Diesel Generator Rooms (Section 1R05.3.b)
05000341/2011009-03	NCV	Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel (Section 1R05.5.b)

Closed

05000341/2011009-01	NCV	Unauthorized Transient Combustibles (Section 1R05.1.b)
05000341/2011009-02	NCV	Inadequate Detection in Emergency Diesel Generator Rooms (Section 1R05.3.b)
05000341/2011009-03	NCV	Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel (Section 1R05.5.b)
05000341/2010004-01	URI	Inadequate Procedures to Control the Plant from the Dedicated Shutdown Panel (Section 4OA5)

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

ANALYSES AND CALCULATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
DC-4921	Appendix R Calculations	G
DC-5783	Appendix R Equipment and Cable Justifications	D
DC-6119	Appendix R Database	C
DC-6197	Reactor Coolant System Response Analysis to Support 10 CFR Part 50 Appendix R Compliance	A
DC-6197	SRV Blowdown Analyses to Support 10CFR50 Appendix R Compliance	0
DC-6370	Appendix R Protective Device Coordination Calculation	0
FPEE-03-0012	NFPA 13-1980 Noncompliance for the EDG Fuel Oil Storage Tank Room Sprinkler Systems	0
FPEE-05-0012	Manual Action Feasibility Study for AOP 20.000.18 Revision 36	0
FPEE-08-0030	HPCI Sprinkler System Requirement for Safe Shutdown	0
FPEE-09-0014	RHR CO2 System Actuation and Related Dampers	0
FPEE-09-0044	Acceptability of Fire Detector Spacing and Location Non-Conformance for Detection Zones 52, 53, 54, and 55	0

CORRECTIVE ACTIONS ISSUED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
11-23024	2011 TFPI – Improper Staging of Combustibles	March 24, 2011
11-23532	2011 TFPI: NRC Concern: Equipment Specified in 23.406 for Connection to T4901F011 Cannot Be Found	April 6, 2011
11-23714	EDG Exhaust Tornado Missile License Basis Clarification	April 12, 2011
11-23732	2011 TFPI: NRC Concern TFPI-11-056, T Room South Divisional S/D Strategy	April 12, 2011
11-23783	2011 TFPI NRC Question on DC-4921 (TFPI-064)	April 13, 2011
11-23837	2011 TFPI NRC Concern: Door RA2-6 Noted as not Latching During Walkdown	April 15, 2011
11-23838	2011 TFPI NRC Question: 20.000.18 Walkdown Issue: Non Conductive Stick Inventory	April 15, 2011
11-23943	2011 TFPI – NRC Question Regarding EDG CO2 Heat Detection	April 18, 2011

CORRECTIVE ACTIONS ISSUED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
11-23944	2011 TFPI – NRC Question Regarding Smoke Detector Spacing in the Div 2 Switchgear Room	April 18, 2011
11-23945	2011 TFPI – NRC Question Regarding Changes to the Fire Protection Program	April 18, 2011
11-24069	Design Calculations DC-5003 EDG Loading and DC-4921 Appendix R Calculations Interdependencies	April 21, 2011
11-24336	Vendor Calculations Use an Incorrect CO2 Flooding Factor	April 28, 2011
11-24340	DC-6370, Vol 1 Rev 0 Calculation Clarification	April 28, 2011
11-24344	2011 TFPI – NRC Questioned the Need to Verify the Results of DC-6197	April 28, 2011
11-24345	2011 TFPI NRC Concern: 20.000.18 Performance at Minimum Staffing	April 28, 2011

CORRECTIVE ACTIONS REVIEWED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
02-12381	Fire Protection Sprinklers in All Four EDG Fuel Oil Tank Rooms Exceed Allowed Distance from Ceilings per NFPA 13	April 21, 2002
08-22727	HPCI Pump Room	March 17, 2009
10-23471	MSO Issue – High - Low Interface Concern	April 26, 2010
10-23472	MSO Issue – LPCI Loop Select Concern	April 26, 2010
10-23476	MSO Issue – RHR Flow Diversions	April 26, 2010
10-25368	Autostart of Both Electric and Diesel Fire Pumps	March 31, 2011
10-26471	Document Applicability of NRC Information Notice 2010-13, Failure to Ensure Post-Fire Shutdown Procedures Can Be Performed, to Fermi.	July 29, 2010
10-27645	NRC Concern: Issues with 20.000.18	August 31, 2010
10-28770	TRM Fire Seal Found Not in Compliance with DECO Spec 3071-198/28.507.05	March 18, 2011
11-21611	Not Able to Access Room	March 23, 2011
11-22389	Failure to Meet Milestone in Timed Walkdown of 20.000.18	March 8, 2011

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
6E721-2800-05	Cable Trays Reactor & Auxiliary Building Plan Torus Area & Basement El. 562'-0" NE	T
6E721-2800-06	Cable Trays Reactor & Auxiliary Building Plan Torus Area & Basement El. 562'-0" SE	U

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
6E721-2801-06	Cable Tray Identification Reactor and Auxiliary Buildings – 1 ST Floor Division I, Division II and BOP – Control Elevation 583' – 6"	X
6E721-2801-08	Cable Tray Identification (Control) Enlarged Plan – Auxiliary Building Northeast Area Elevation 583' – 6" 1 ST Floor	M
6E721-2802-08A	Cable Tray Identification (Control) Enlarged Plan – Auxiliary Building Northeast Area Elevation 613' – 6" 2 ND Floor	O
6E721-2838-12A	Class 1 Conduit As-Built Installation Power, Control, Instrumentation Conduit Reactor Building Elevation 613' – 6" 2 ND Floor	H
6E721-2838-12J	Class 1 Conduit As-Built Installation Power, Control, Instrumentation Conduit Reactor Building Elevation 613' – 6" 2 ND Floor	P
6E721-2838-13C	Class 1 Conduit As-Built Installation Power, Control and Instrumentation Reactor Building 3 RD Floor Elevation 641' – 6"	
6E721-2838-22L	Class 1 Conduit As-Built Installation Power, Control, Instrumentation Conduit	J
6E721-2838-22M	Class 1 Conduit As-Built Installation Power, Control and Instrumentation Conduit Auxiliary Building Elevation 613' – 6" 2 ND Floor	G
6E721-2838-22N	Class 1 Conduit As-Built Installation Power, Control and Instrumentation Conduit Auxiliary Building Elevation 613' – 6" 2 ND Floor	C
6E721-2838-23A	Class 1 Conduit As-Built Installation Power, Control and Instrumentation Auxiliary Building Elevation 643' – 6" Third Floor	M
6E721-2838-23F	Class 1 Conduit As-Built Installation Power, Control and Instrumentation Auxiliary Building 2 ND Floor Elevation 613' – 6"	L
6E721-2838-23H	Class 1 Conduit As-Built Installation Sections Power, Control and Instrumentation Auxiliary Building Elevation 643' – 6" Third Floor	E
6E721-2872-11	Conduit Plan Turbine Building, Second Floor Elevation 613' – 6" Northwest Area	O
6E721-2882-12	Electrical Equipment – Conduit Plan Radwaste Building Second Floor Elevation 613' – 6" Center Area	L

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
6E721-2882-13	Electrical Equipment – Conduit Plan Radwaste Building Second Floor Elevation 613' – 6" West Area	O
6I721-2095-02	Schematic Diagram Automatic Depressurization System Sol Valves B2104F013J, P & R	P
6I721-2095-03	Schematic Diagram Automatic Depressurization System Sol Valves B2104F013D, K & L	N
6I721-2095-04	Schematic Diagram Automatic Depressurization System Sol Valves B2104F013F, G & H	U
6I721-2095-05	Schematic Diagram Automatic Depressurization System Sol Valves B2104F013B, C & E	Q
6I721-2095-09	Schematic Diagram Automatic Depressurization System Sol Valves B2104F013A, M & N	Q
6I721-2783-01	Connection Diagram Dedicated Shutdown Panel H21P623	C
6I721-2783-02	Connection Diagram Dedicated Shutdown Panel H21P623	A
6I721-2783-03	Connection Diagram Dedicated Shutdown Panel H21-P623 Transfer Relaying	A
6I721-2783-04	Connection Diagram Dedicated Shutdown Panel H21P623 Terminations	I
6I721-2785-01	Schematic Diagram Dedicated Shutdown Panel H21P623 Transfer Relaying	D
6I721-2785-02	Loop Diagram Dedicated Shutdown Panel H21P623 Instrumentation	H
6I721-2868-15	Installation – Fire Detection System 3 rd Floor Reactor Bldg. El. 643'-6" Zone 14	K
6I721N-2868-01	Schematic Diagram Diesel Generator No. 11 Room CO2 Fire Protection System	O

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
6M721N-2213	Water Fire Protection System Diesel Fuel Oil Tank Rooms Division II – RHR Complex	G
6SD721-2530-11	One Line Diagram 260/130V ESS Dual Battery 2PB Distribution – Division II	AJ
6SD721-2530-12	One Line Diagram 260/130V BOP Battery 2PC Distribution	AY
6SD721-2543-26	Wiring Diagram Dedicated Shutdown Panel Control Panel H21P623	0

OTHER

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Chemetron Low Pressure CO2 System Test Report	January 27, 1983

PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
20.000.18	Control of the Plant from the Dedicated Shutdown Panel	45
20.000.18	Control of the Plant from the Dedicated Shutdown Panel	47
20.000.18	Control of the Plant from the Dedicated Shutdown Panel	48
20.000.22	Plant Fires	41
29.100.01, Sh 1	RPV Control	13
MOP03	Operations Conduct Manual; Policies and Practices	28
MOP03	Operations Conduct Manual; Policies and Practices	29
ODE-9	Operations Department Expectation; Manpower Scheduling	8
ODE-9	Operations Department Expectation; Manpower Scheduling	9

LIST OF ACRONYMS USED

°F	Degrees Fahrenheit
ADAMS	Agencywide Documents Access and Management System
CARD	Condition Assessment Resolution Document
CFR	Code of Federal Regulations
CO ₂	Carbon Dioxide
DC	Direct Current
DRS	Division of Reactor Safety
EDG	Emergency Diesel Generator
FSAR	Final Safety Analysis Report
IMC	Inspection Manual Chapter
IR	Inspection Report
MCC	Motor Control Center
MCC	Motor Control Center
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NFPA	National Fire Protection Association
NRC	U.S. Nuclear Regulatory Commission
PARS	Publicly Available Records
SDP	Significance Determination Process
UFSAR	Updated Final Safety Analysis Report

J. Davis

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Sincerely,

/RA/

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

Docket No. 50-341
License No. NPF-43

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