

WBN2Public Resource

From: Poole, Justin
Sent: Tuesday, September 20, 2011 1:50 PM
To: Arent, Gordon; Bryan, Robert H Jr
Cc: Milano, Patrick; WBN2HearingFile Resource
Subject: Draft RAIs on the Fire Protection Review for WBN 2
Attachments: WBN FP questions (9-20) revised.docx

Gordon/Bob,

In reviewing the latest fire protection report, the staff has come up with the attached questions. Please review to ensure that the RAI questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. Please also let me know how much time Tennessee Valley Authority (TVA) needs to respond to the RAI questions.

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Question 1 (II-26.1)

In the response to RAI FPR II-26 (ML11129A158), TVA noted that the frequency of the GL 82-21 annual fire protection audit has been changed to 24 months and refers to an August 28, 2002 letter (ML022460173) to the NRC documenting this change. TVA states in the August 28, 2002 letter that this change was implemented using a performance-based schedule as allowed by the NRC Regulatory Guide 1.189 (section 1.7.10.1 of revision 0).

Provide more detail regarding this change. In particular,

- A summary of the performance-based process used make the change
- A summary of how the change is being monitored

This summary information would be appropriate to include in the FPR at the correct level of detail.

Question 2 (VII-26)

The text of Part VII, Section 2.4 “Intervening Combustibles,” indicates that this deviation is for the Auxiliary Building. However, the reviewers have identified two instances of reliance on this deviation for areas outside of the Auxiliary Building.

- Table I-1 lists Deviation 2.4 for Fire Area 53, Diesel Generator Building (Page I-12) and Fire Area 60, IPS.
- These are also reflected in Part VI, Section 3.59, (Diesel Generator Building) and Section 3.66, (IPS). Section 3.59 was revised to include crediting the deviation for the 8/15/11 version of the FPR.

The deviation should be revised to reflect all of the areas that it is relied upon in.

Question 3 (II-48)

The information used to create the SSER 18 section 3.1.4.2 “Internal Conduit Fire Barrier Penetration Seals” currently exists only in an RAI response from July 1, 1994 (ML072320559) and not in the FPR.

Additionally, there is a conflict regarding the combustibility of the seal material between the RAI response and the internal conduit seal definition in Part II of the FPR.

In order to achieve a cleaner licensing basis, it would be appropriate to include this information in the FPR.