



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I**  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

January 31, 2013

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

**SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - NOTIFICATION OF  
CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION**

Dear Mr. Pacilio:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) staff will conduct a triennial fire protection baseline inspection at Limerick Generating Station, in May 2013. The inspection team will be led by Jon Lilliendahl from the NRC Region I Office. The team will be composed of personnel from the NRC Region I Office. The inspection will be conducted in accordance with IP 71111.05T, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information Gathering Visit - Week of April 22, 2013
- On-site Inspection - Weeks of May 6, 2013 and May 20, 2013

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the station fire protection programs, fire protection features, post-fire safe shutdown capabilities, plant layout, mitigating strategies to address Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.54(hh)(2); and, as necessary, obtain plant specific site access training and badging for unescorted site access.

Initial lists of the documents the team will review during the conduct of the inspection are included in Enclosures 1 and 2. The team leader will contact you with any additional specific document requests prior to the information gathering visit.

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 staff and licensing organization personnel to serve as points of contact during the inspection.

We request that during the on-site inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the station fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest for the fire protection portion of the inspection are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance (i.e., fire protection compliance assessment documents). For the 10 CFR 50.54(hh)(2) portion of the inspection, those documents implementing your mitigating strategies and demonstrating the management of your commitments for the strategies are of specific interest. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, including the electrical aspects of the relevant post-fire safe shutdown analyses, reactor plant fire protection systems and features, and the station 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, under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Jon Lilliendahl, the team leader, in the Region I Office at 610-337-5129.

Sincerely,

*/RA/*

John F. Rogge, Chief  
Engineering Branch 3  
Division of Reactor Safety

Docket Nos. 50-352, 50-353  
License Nos. NPF-39, NPF-85

Enclosures:

1. Fire Protection Program Supporting Documentation
2. Mitigating Strategies Supporting Documentation

cc: Distribution via ListServ

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cc: Distribution via ListServ

Distribution: (via email - see next page)

DOCUMENT NAME: G:\DRS\Engineering Branch 3\Lilliendahl\Lim 2013 TFP 90Day.docx  
 ADAMS ACCESSION NUMBER: ML13031A446

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRS	RI/DRS			
NAME	JLilliendahl	JRogge			
DATE	1/30/13	01/31/13			

Distribution w/encl:

W. Dean, RA

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D. Roberts, DRP

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M. Gray, DRP

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RidsNrrPMLimerick Resource

RidsNrrDorlLp1-2 Resource

ROPreports Resource

J. Rogge, DRS

J. Lilliendahl, DRS

## Enclosure 1

### Fire Protection Program Supporting Documentation

The documents and information requested below should generally be made available to the inspection team during the on-site information gathering visit for the team's use both on-site and off-site during the inspection. Electronic format is the preferred media, except where specifically noted. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are of course always acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

Approximately three weeks before the on-site information gathering visit, the following documents should be made available to the team leader for review in the regional office:

- Post-fire Safe Shutdown or Alternative Shutdown Analysis (request A.1)
- Fire Hazards Analysis (request A.2)
- Individual Plant Examination for External Events (Fire Chapter) (request A.3)
- Fire Probabilistic Risk Assessment (PRA) Summary Document (request A.4)

Based on a review of the above four documents, the team leader will identify a preliminary list of fire areas being considered for inspection prior to the on-site information gathering visit. During the information gathering visit, or shortly thereafter, the fire areas selected for inspection will be determined.

This document request is based on typical documents that plants have. As such, this generic document request is not meant to imply that your plant is required to have all of the listed documents. It is recognized that some documents listed below may not be available for your plant. In addition, the document titles listed below are based on typical industry document names; your plant specific document titles may vary. If there are any questions or concerns, contact the NRC inspection team leader.

#### A. DESIGN AND LICENSING BASIS DOCUMENTS

- A.1 Post-fire Safe Shutdown Analysis.
- A.2 Fire Hazards Analysis.
- A.3 Individual Plant Examination for External Events (IPEEE) (Fire Chapter), including:
  - LIST of actions taken or plant modifications performed in response to the IPEEE results
- A.4 Fire Probabilistic Risk Assessment (PRA) Summary Document.
- A.5 Fire Protection Program and/or Fire Protection Plan.

- A.6 LIST of post-fire safe shutdown or alternative shutdown systems (i.e., safe shutdown equipment list).
  - A.7 Fire Protection System Design Basis Document.
  - A.8 Post-fire Safe Shutdown Design Basis Document.
  - A.9 LIST of applicable NFPA codes and standards (i.e., codes of record).
  - A.10 LIST of deviations from NFPA codes of record.
  - A.11 NFPA Compliance Review Report.
  - A.12 Report or evaluation that compares the fire protection program to the NRC Branch Technical Position (BTP) 9.5-1 Appendix A.
  - A.13 COPY of licensee submittals and NRC safety evaluation reports that are specifically listed in the facility operating license for the approved fire protection program.
  - A.14 COPY of NRC Safety Evaluation Reports for fire protection program and post-fire safe shutdown or alternative shutdown features.
  - A.15 COPY of NRC approved exemptions for plant fire protection and post-fire safe shutdown features.
  - A.16 COPY of exemption requests submitted but not yet approved for plant fire protection and post-fire safe shutdown features.
  - A.17 Facility Operating License.
  - A.18 Technical Specifications (electronic format).
  - A.19 Technical Requirements Manual (electronic format).
  - A.20 Updated Final Safety Analysis Report (electronic format).
- B. GENERAL PLANT DESIGN DOCUMENTS
- B.1 Piping and instrumentation diagrams (P&IDs) for post-fire safe shutdown and alternative shutdown systems (C-size paper drawings).
  - B.2 P&IDs for fire protection systems, including fire water supply, water suppression sprinklers and deluge, and CO<sub>2</sub> and Halon systems (C-size paper drawings).
  - B.3 Yard layout drawings for underground fire protection buried piping (C-size paper drawings).
  - B.4 AC and DC electrical system single line diagrams, from off-site power down to the safety-related buses (C-size paper drawings).

- B.5 Equipment location drawings which identify the physical plant locations of post-fire safe shutdown or alternative shutdown equipment (C-size paper drawings).
- B.6 Plant layout drawings which identify: (C-size paper drawings)
- Plant fire area boundaries
  - Combustible control zone drawings
  - Areas protected by automatic fire suppression and detection
  - Locations of fire protection equipment

C. CLASSIC FIRE PROTECTION

- C.1 COPY of fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
- C.2 LIST of calculations and engineering analyses, studies, or evaluations for the fire protection system, including the fire water system.
- C.3 Hydraulic calculation or analysis for fire protection water system.
- C.4 LIST of routine tests, surveillances, and preventive maintenance on fire pumps, including pump controllers and batteries.
- C.5 Last two completed annual fire pump pressure and flow tests.
- C.6 Last two completed monthly and/or quarterly fire pump tests.
- C.7 Last two completed fire loop flow tests and loop flushes.
- C.8 Last five hot work permits (at power).
- C.9 Last five transient combustible permits (at power).
- C.10 For fire brigade equipment provide the following:
- Procedure for inventory and inspection
  - Most recent inspection and inventory results
- C.11 Fire Brigade Qualifications, including self-contained breathing apparatus (SCBA) and training lesson plans.
- C.12 Pre-fire plans for all fire areas (electronic copies).
- C.13 For Emergency Lighting Units (ELU), provide the following:
- LIST of Preventive Maintenance tasks and frequencies
  - Most recently performed monthly or quarterly functional test
  - Most recently performed battery discharge performance test
  - ELU battery loading analysis
  - Vendor manual(s) for on-site inspector use
  - Results of black-out testing (if performed)

- C.14 Impairment Log (at start of inspection), for fire protection features that are out of service.
- C.15 LIST of penetration seal work, re-work, or installation activities, in the last three years.
- C.16 LIST of fire wrap work, re-work, or installation activities, in the last three years.
- C.17 Fire protection system health reports for the two most recent quarters.
- C.18 Fire protection program health report for the two most recent quarters.
- C.19 Emergency lighting system health reports for the two most recent quarters.
- C.20 LIST of fire protection system design changes completed in the last three years.
- C.21 COPY of the test, surveillance, or maintenance procedure (current revision), for any of the requested "last performed" test, surveillance, or maintenance. (Typically document control systems only maintain pages from procedures that were written on such as data sheets. This request is for the full copies of the procedures that were provided in earlier requests, assuming that the provided copies are not complete.)

D. ELECTRICAL

- D.1 Breaker and fuse coordination calculation for post-fire safe shutdown or alternative shutdown equipment.
- D.2 Maintenance procedures that verify breaker over-current trip settings to ensure coordination remains functional, for post-fire safe shutdown or alternative shutdown equipment.
- D.3 Last surveillance demonstrating operability of those components operated from the safe shutdown or alternative shutdown panel.
- D.4 LIST of post-fire safe shutdown or alternative shutdown design changes completed, in the last three years.

E. SPURIOUS FIRE INDUCED CIRCUIT FAULT

- E.1 Multiple Spurious Operation (MSO) Expert Panel Report.



**F. OPERATIONS**

- F.1 LIST of calculations and engineering analyses, studies, or evaluations for the safe shutdown and alternative shutdown methodologies.
- F.2 LIST of licensed operator Job Performance Measures (JPMs) for operator manual actions required by post-fire safe shutdown or alternative shutdown.
- F.3 LIST of non-licensed operator training associated with post-fire safe shutdown or alternative shutdown manual actions which would be performed by a non-licensed operator (including JPMs, in-field training walkdowns, simulations, or initial qualification).
- F.4 Lesson plans for post-fire safe shutdown or alternative shutdown training for licensed and non-licensed operators.
- F.5 For operator manual actions (OMAs), provide the following:
- Manual Action Feasibility Study
  - Operator Time Critical Action Program
  - Time lines for time-critical OMAs
  - Time line validations
- F.6 Operating procedures for post-fire safe shutdown from the control room.
- F.7 Operating procedures for post-fire safe shutdown from outside the control room.
- F.8 For safe shutdown equipment and tools, provide the following:
- Procedure for inventory and inspection
  - Most recent inspection and inventory results
- F.9 LIST of procedures that implement cold shutdown repairs.
- F.10 For cold shutdown repairs, provide the following:
- Procedure for inventory and inspection (i.e., needed tools, material, etc.)
  - Most recent inspection and inventory results
- F.11 For credited radio communications, provide the analysis for the adequacy and availability of the radio communications (e.g., power supply availability, radio coverage tests, etc.)
- F.12 Environmental and habitability evaluations for post-fire operator manual actions (temperature, smoke, humidity, SCBAs, etc.).

**G. ADMINISTRATIVE CONTROL, OVERSIGHT, AND CORRECTIVE ACTION PROGRAMS**

- G.1 Self assessments, peer assessments, and audits of fire protection activities or post-fire safe shutdown capabilities for the last three years.
- G.2 LIST of open and closed condition reports for the fire protection system for the last three years.

- G.3 LIST of open and closed condition reports for emergency lighting units for the last three years.
- G.4 LIST of open and closed condition reports for post-fire safe shutdown (SSD) or alternative shutdown (ASD) issues for the last three years. This includes issues affecting the SSD or ASD analysis, fire hazards analysis, SSD or ASD operating procedures and/or training, timeline evaluations for operator actions, and supporting engineering evaluations, analysis, or calculations.
- G.5 LIST of all Generic Letter 86-10 evaluations.
- G.6 COPY of all Generic Letter 86-10 evaluations performed in the last three years.

## Enclosure 2

### Mitigating Strategies Supporting Documentation

#### H. 10 CFR 50.54(hh)(2) MITIGATING STRATEGIES DOCUMENTS

- H.1 LIST of all changes to regulatory commitments made to meet the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh)(2).
- H.2 LIST of procedures and guidelines that were revised or generated to implement the mitigating strategies. These could be extensive damage mitigation guidelines (EDMGs), severe accident management guidelines (SAMGs), emergency operating procedures (EOPs), abnormal operating procedures (AOPs), etc.
- H.3 A matrix that shows the correlation between the mitigation strategies identified in Nuclear Energy Institute 06-12, Revision 2, "B.5.b Phase 2 & 3 Submittal Guideline," issued December 2006, and the site-specific procedures or guidelines that are used to implement each strategy.
- H.4 LIST of engineering evaluations or calculations that were used to verify the engineering bases for the mitigating strategies.
- H.5 Piping and instrumentation diagrams (P&ID) or simplified flow diagrams for systems relied upon in the mitigating strategies. These could be the type used for training (C-size paper drawings).
- H.6 LIST of modification packages or summary descriptions of modifications with simplified drawings, for necessary facility changes to implement the mitigating strategies.
- H.7 LIST of routine tests, surveillances, and preventive maintenance for equipment and tools needed to implement 10 CFR 50.54(hh)(2) strategies.
- H.8 For equipment and tools needed to implement 10 CFR 50.54(hh)(2) strategies, provide the following:
- Procedures for inventory and inspection
  - Most recent inspection and inventory results
- H.9 LIST of 10 CFR 50.54(hh)(2) strategies, if any, which have implementing details that differ from that documented in the submittals or the safety evaluation report.
- H.10 Site general arrangement drawings that show the majority of buildings and areas referenced in 10 CFR 50.54(hh)(2) documents (C-size paper drawings).
- H.11 Training records, training matrix, and lesson plans related to 10 CFR 50.54(hh)(2).
- H.12 Copies of memoranda of understanding (MOU) (e.g., with local fire departments) required to implement any mitigating strategies.