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## INSPECTION PROCEDURE 88054

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### FIRE PROTECTION (TRIENNIAL)

#### 88054-01 INSPECTION OBJECTIVE(S)

The objectives of this procedure are to provide requirements and guidance for evaluating the licensee's or certificate holder's fire protection capability from a programmatic, design-based and risk-informed perspective. The evaluation is to determine whether the following aspects of the licensee's or certificate holder's fire protection capability meet U.S. Nuclear Regulatory Commission (NRC) issued license or certificate requirements, and are adequate to preclude or mitigate the consequences of a fire:

- a. Program for control of combustibles and ignition sources within the plant;
- b. Program to ensure adequate fire detection and suppression capability;
- c. Program to ensure that the material condition, design, and qualification testing of passive fire protection features are adequate;
- d. Program to ensure that compensatory measures will be in place for out-of-service, degraded or inoperable fire protection equipment, systems or features;
- e. Program to ensure that feasible and reliable emergency operating actions will be taken if required to mitigate the adverse affects of a fire; and
- f. Program to ensure that maintenance and facility changes continue to meet applicable codes and standards, and license or certificate bases.

NOTE: This Inspection Procedure (IP) 88054, "Fire Protection (Triennial)" will be used in lieu of IP 88055, "Fire Protection (Annual)" when the triennial inspection is scheduled. The annual inspection complements the triennial inspection by focusing on the material condition and operational status of the fire protection program, specifically in the areas of active fire detection/suppression systems and passive fire confinement. Inspector(s) shall utilize the guidance in IP 88055, "Fire Protection (Annual)" as necessary, for verification of fire protection program specifics while performing the triennial inspection.

#### 88054-02 INSPECTION REQUIREMENTS AND GUIDANCE

The selection of fire protection features to be reviewed depends on the specifics of each licensee's or certificate holder's program Fire protection requirements for licensees vary greatly

because of the significant differences in operations, structures, and process materials at regulated facilities. Therefore, the inspector should, as part of inspection preparation, review fire protection program documentation specific for the licensee or certificate holder to be inspected. This review should include a review of the license, license condition(s), license application, or technical safety requirements specific to the fire protection program at the facility to be inspected. In addition, the inspector should review the parts of the facility Integrated Safety Analysis (ISA) Summary applicable to fire safety, as well as the associated Fire Hazard Analysis (FHA). Additional insight on the ISA and FHA may be obtained from the Division of Fuel Cycle Safety and Safeguards project management and fire protection staff. In preparing for the inspection, the inspector should also discuss with the project inspector and resident inspection staff, where applicable, any programmatic fire protection equipment availability or reliability problems (such as recurring failures or failures resulting in reportable events) the licensee or certificate holder has experienced since the last annual inspection.

The licensee or certificate holder should have a well developed and documented fire protection program. The program should describe, as a minimum, the following elements:

- a. Identification of the management representative who is given the authority to implement the program, as well as identification of a supervisory person responsible for day to day implementation of the program;
- b. FHA and periodic reviews;
- c. Program for identification and resolution of problems identified by the FHA, periodic audits and inspections;
- d. Fire protection equipment maintenance and testing program. Fire protection equipment includes passive controls and automatic/manual suppression systems;
- e. Program to control combustible/flammable materials and hot work activities (i.e. welding, cutting, and grinding). Typically, permits are issued and a fire watch is maintained during such work;
- f. Routing of circuits important to ensure availability of safety controls;
- g. Potential ignition sources that could affect these controls;
- h. Review the Hazard and Operability analysis or other analyses for systems hardware and procedures as appropriate, to determine which safety controls are assumed to be capable and reliable based on the fire protection associated with the controls; and
- i. Fire brigade training program, including details such as training subjects, frequency of training classes and drills, and qualification standards.

02.01 Pre-Fire Plans.

- a. **Inspection Requirement.** Review changes in the facility Pre-Fire Plans for the selected areas (if required by license condition) made since the previous triennial fire protection inspection, and determine if the changes are consistent with the facility FHA.
- b. **Inspection Guidance.** In some instances, the Pre-Fire Plan is part of the general radiological emergency plan required by the license or certificate. However, the Pre-Fire Plan is different from a Radiological Contingency Plan in that it requires information needed by fire-fighting personnel responding to an emergency. Often, the same team of employees is trained to respond to both fires and radiological emergencies. This is acceptable, since a fire emergency may turn out to be a radiological emergency as well.

The inspector should determine that the Pre-Fire Plans continue to include these elements:

- 1. The most favorable direction to attack a fire in each area taking into consideration the ventilation direction, access to hallways, stairs and doors which are most likely to be fire free, and the best station or elevation for fighting the fire.
- 2. Designation of plant systems that should have plans in place to reduce the damage potential from a local fire which could affect a greater area (e.g., any hydraulic or electrical systems in the area covered by the specific fire fighting procedure that could increase the hazards in the area because of over pressurization or electrical hazards).
- 3. Designation of vital heat sensitive (safety controls and items relied on for safety [IROFS]) system components that should be kept cool while fighting a local fire. Critical equipment which contains particularly hazardous combustible material should be designated to receive cooling.
- 4. Identification of radiological and toxic hazards in fire zones.
- 5. Ventilation system operation that ensures desired plant pressure distribution when the ventilation flow is modified for fire containment or smoke clearing operations.
- 6. Indication of the areas of concentration of combustibles, storage of flammable or combustible liquids, and areas where the use of water for fire suppression is restricted due to criticality safety concerns.
- 7. Description of the offsite fire department's resources, and estimated response time by the offsite fire department to provide assistance to the facility.
- 8. Identification of, preferably with the help of site plans and drawings, the location of firefighting equipment such as portable extinguishers, automatic fire

9. suppression systems, stand-pipes, hydrants, hoses, and manual pull stations for the fire alarm. In addition, passive features like fire walls and fire doors should be clearly indicated.
10. Identification of evacuation routes and emergency lighting should be clearly identified.
11. Identification of fire suppression system and flammable gas isolation valves.

02.02 Control of Transient Combustibles and Ignition Sources.

- a. Inspection Requirement. Determine whether programs and procedures remain in place and are adequate to control transient combustible materials in accordance with the licensee's or certificate holder's procedures.
- b. Inspection Guidance. The program should require routine housekeeping and control of combustible materials inspections. During facility tours and walk downs, the inspector should assess whether or not combustible/flammable materials are controlled in accordance with the licensee's or certificate holder's procedures. Material identified during the inspection should be documented.

1. Transient Combustibles and associated work that should be evaluated include:

- (a) Controls related to the quantity and handling of combustibles in and around the facility so that the potential for a significant, damaging fire is minimized.
- (b) Requirements that storage of combustible materials should not be allowed in locations where accumulation of combustible materials could occur, i.e. above suspended ceilings or below raised floors, under glove boxes or other process equipment, under stairs and/or in stairwells.
- (c) Requirements for handling of waste, scrap, rags, trash, and other combustible materials resulting from work activity. These materials shall be disposed of in approved waste receptacles, or removed from the building at least once per day, at the end of the work shift.
- (d) Controls for storage of materials susceptible to spontaneous ignition, such as oily rags. In addition, metals such as uranium and zirconium are known to be combustible, especially when divided in a fine form.
- (e) Requirements that prevent the storage of unnecessary combustible materials near ducts and high-efficiency particulate air filters in housings/ducts of filter rooms that are in service.
- (f) Requirements to prevent accumulation of combustible materials in mechanical rooms, electrical rooms, or process areas.

- (g) Requirements to prevent blockage of access to active fire protection equipment and emergency exit paths from facilities.
  - (h) Controls on the use of non-combustible containers for storage of combustible trash.
  - (i) Provisions to clean spills of flammable or combustible liquids.
2. Storage and Handling of Flammable and Combustible Liquids and Gases that should be evaluated include:

The construction, installation, operation, and maintenance of combustible liquid storage and the related loading and dispensing systems should comply with National Fire Protection Agency (NFPA) 30, Flammable and Combustible Liquids Code. The construction, installation, operation, and maintenance of bulk gas (including liquefied gas) storage and the related loading and dispensing systems should comply with good industry practice and the relevant NFPA standards, as applicable, for example, NFPA 50, Bulk Oxygen Systems at Consumer Sites; NFPA 50B, Liquefied Hydrogen Systems at Consumer Sites; and NFPA 54, National Fuel Gas Code.

- (a) The use of approved containers and tanks (NFPA 30) to store and handle flammable and combustible liquids.
- (b) Requirements to ensure those connections on drums and combustible liquid and gas piping are not leaking.
- (c) Proper storage practice to minimize the risk of fire, including spontaneous combustion.
- (d) Storage of flammable liquids in closed containers when not in use.
- (e) Grounding of bulk drums of flammable liquids during dispensing.
- (f) Use of fire-resistant barriers to separate fuel gas cylinders and oxygen cylinders while in storage.
- (g) Ventilation of storage tanks to prevent the development of excessive vacuum or pressure as a result of filling, emptying or atmosphere temperature changes.
- (h) Installation of combustible gas analyzers for enclosed spaces in which flammable mixtures of combustible gas could accumulate outside of the storage vessels, piping, and utilization equipment. The analyzer shall be set to alarm at a concentration no higher than 25 percent of the lower explosive limit.

- (i) Use of fire-resistant hydraulic fluid in presses or other hydraulic equipment.
- (j) Systems that do not allow uncontrolled release of vapors when flammable or combustible solvent are used.
- (k) Operations involving metals, such as uranium and zirconium, to prevent combustible dust cloud formation and combustible scrap and swarf accumulation. Examples of these type of operations involve sawing, grinding, machining, and abrasive cutting.
- (l) Stationary Combustion Engines (i.e. emergency diesel generators) if located in part of a structure housing fuel process(es), the engine should be in an enclosure having a fire resistance of at least 1 hour. Fuel storage tanks, except for day tanks, should be located outside the room.

3. Ignition Sources and associated work that should be evaluated include:

The inspector should verify implementation and adequacy of the hot work program by observing any welding, grinding, brazing, or flame cutting being performed in any of the process areas. The licensee's or certificate holder's hot work program, as a minimum, should address the following precautions during hot work:

- (a) Hot work must not be permitted in flammable (explosive) atmospheres; near large quantities of exposed readily ignitable materials; in areas not authorized by management; or on metal partitions, walls, or roofs with a combustible covering or with combustible sandwich-type panel construction.
- (b) Floors must be free of combustibles, such as wood shavings. If floors are of combustible material, they must be kept wet or otherwise protected.
- (c) If combustibles are closer than 35 feet to the welding or cutting process, and the work cannot be moved or the combustibles relocated at least 35 feet away, they must be protected with flame-resistant covers or metal guards or curtains. This also applies to walls, partitions, ceilings, or roofs of combustible construction.
- (d) Openings in walls, floors, or ducts must be covered if within 35 feet of the work. Be alert for cutting conditions that could propel sparks overhead or downward, where combustibles are within a 35 foot sphere of the point of operation.
- (e) Cutting or welding on pipes or other metal in contact with combustible walls, partitions, ceilings, or roofs must not be performed if close enough to cause ignition by heat conduction.

- (f) Charged and operable fire extinguishers must be readily available. Trained fire watchers must be posted. In general, the posted fire watchers should not be engaged in any other activities and should remain posted for at least 30 minutes after the hot work is complete.

### 02.03 Passive Fire Protection Systems.

- a. Inspection Requirements. Determine whether programs and procedures remain in place and are adequate to ensure that the fire ratings of fire area boundaries, equipment, and materials used for fire barriers are appropriate for the credible fire hazards in the area.
- b. Inspection Guidance. The inspector should walk down passive fire protection features to determine whether inspection, testing, and maintenance (ITM) procedures and programs remain in place to ensure adequate performance of passive fire protection features.
  - 1. Fire Doors.
    - (a) Fire door assemblies shall be inspected and tested not less than annually.
    - (b) No open holes or breaks should exist in surfaces of either the door or frame.
    - (c) Glazing, vision light frames, and glazing beads should be intact and securely fastened in place, if so equipped.
    - (d) The door, frame, hinges, hardware, and noncombustible threshold should be secured, aligned, and in working order with no visible signs of damage.
    - (e) Door clearances at the door edge to the frame, on the pull side of the door, should not exceed clearances listed in NFPA 80.
    - (f) The active door self closing device is operational, that is, the active door completely closes when operated from the full open position.
    - (g) If a coordinator is installed, the inactive leaf should close before active leaf.
    - (h) Latching hardware operates and secures the door when it is in the closed position (Generally for the metal doors encountered during inspections, a 3 hour door needs a 5/8 inch latch throw, and a 1 hour door needs 12 inches. [Refer to NFPA 80 if an issue arises]).
    - (i) Slats, end locks, bottom bar, guide assembly, curtain entry hood, and flame baffle should be correctly installed and intact.

- (j) Drop release arms and weights should not be blocked or wedged.
- (k) Fusible links, if equipped, are in the proper location; chain/cable, s-hooks, eyes, and so forth, are in good condition (i.e., no kinked or pinched cable, no twisted or inflexible chain); and links are not painted or coated with dust or grease.
- (l) Inspection shall include an operational test for automatic closing doors to verify that the assembly will close under fire conditions. Assembly shall be reset after a successful test.
- (m) Door openings and the surrounding areas shall be kept clear of anything that could obstruct or interfere with the free operation of the door. In addition, blocking or wedging of doors in the open position shall be prohibited.
- (n) Doors normally held in the open position and equipped with automatic closing devices shall be operated at frequent intervals to ensure operation.

2. Fire Dampers.

- (a) Dampers should be tested and inspected one year after installation. The test and inspection frequency should then be every four years.
- (b) Full unobstructed access to the fire or combination fire/smoke damper should be verified and corrected as required.
- (c) If the damper is equipped with a fusible link, the link should be removed for testing to ensure full closure and lock-in place if so equipped. The fusible link shall be reinstalled after testing is complete. If the link is damaged or painted, it should be replaced with a link of the same size, temperature, and load rating.
- (d) The operational test of the damper should verify that there is no damper interference due to rusted, bent, misaligned, or damaged frame or blades, or defective hinges or other moving parts. The damper frame should not be penetrated by any foreign objects that would affect fire damper operations.
- (e) The damper should not be blocked from closure in any way.

1. Fire Walls, Ceilings, and Floor Barriers.

All through penetration protection systems should be tested and rated in accordance with ASTM E 814, "Standard Test Method for Fire Tests of

Through-Penetration Fire Stops”, or ANSI/UL 1479, “Fire Test of Through Penetration Fire Stops.”

During walk down of fire walls, the inspector should verify that the aggregate width of openings in each floor level does not exceed 25 percent of the wall length. The inspector should review installation or repair records to determine whether or not material of an appropriate fire rating (equal to the overall rating of the barrier itself) has been used to fill openings and penetrations and that the installation meets the fire hazard analysis and/or qualification test specifications. Ensure whether material of an appropriate fire rating has been used as fire protection wraps and that the installation meets engineering design. Ensure that fire test data are appropriate for unusual installation configurations and/or application of unusual materials.

#### 02.04 Active Fire Protection Systems.

- a. Inspection Requirements. Ensure that programs and procedures remain in place and are adequate to ensure that the material condition, operational lineup, operational effectiveness, design for fire detection systems, fire water supply and distribution system, fire suppression system, manual firefighting equipment, and fire brigade capabilities meet the code of record and/or the criteria of the ISA.
- b. Inspection Guidance. The inspector should walk down systems, review ITM records, and procedures to determine whether or not an adequate program remains in place.
  1. Water Based Fire Suppression System.
    - (a) Sprinklers do not show signs of leakage; are free of corrosion, foreign materials, paint, and physical damage; and are installed in the proper orientation (e.g., upright, pendent, or sidewall).
    - (b) There is a minimum clearance distance of 18 inches from the sprinkler head to ensure adequate spray pattern development.
    - (c) Pipe and fittings are in good condition and free of mechanical damage, leakage, corrosion, and misalignment.
    - (d) Hangers and seismic braces are not damaged or loose.
    - (e) Gauges on wet pipe sprinkler systems are in good condition and normal water supply pressure is being maintained. Gauges on dry, pre-action, and deluge systems are in good condition to ensure that normal air and water pressures are being maintained.
    - (f) Water flow alarms are functional.

- (g) There is not a major reduction in water flow to the system, such as could be caused by a major obstruction, a dropped gate, a valve that is almost fully closed, or a check valve clapper stuck to the valve seat.
- (h) System control valves are secured by means of a seal or a lock, or electrically supervised.
- (i) The fire water supply and pumping capability is operable and capable of supplying the designed water supply demand for the system.
- (j) Functionality of the system during freezing weather.

2. Gaseous Fire Suppression System.

- (a) Discharge nozzles are free of corrosion, foreign materials, paint, obstruction, and physical damage; and are installed in the proper orientation such that gas dispersal would not be significantly impacted.
- (b) Suppression agent charge pressure is within the normal band as required by the design basis, extinguishing agent control system actuation supply valves are open, extinguishing agent main supply valves are open and the system is in the appropriate standby mode.
- (c) Suppression agent storage containers are free of corrosion and the containers are properly fastened and secured.
- (d) For total flooding systems, the room enclosure's ability to maintain gas concentration is not degraded (e.g., worn-out fire door weather stripping, minimal penetration seal degradation, condition of minor cracks, no ventilation system isolation, removed or missing dampers), or more leakage paths than originally tested.

3. Fire Detection System.

- (a) The main power supply is capable of supporting the design current load during fire conditions. In addition, the secondary power supply should be able to support the full current load of the fire alarm system if the primary supply is lost.
- (b) Batteries are fully charged and free of any terminal corrosion, looseness in terminals' connections, or electrolyte leakage. This condition could cause an increase in the series resistance of the battery set, thus depriving the fire alarm system of the necessary operating potential under large current loads.
- (c) Initiating devices (i.e., heat, smoke, and beam detectors) are able to sense the condition for which they were designed. For example, a smoke

detector attains the alarm state at the smoke concentration for which the detector was listed. In the case of manual fire alarm pull stations, the actuation of the device should trigger the fire alarm.

- (d) Heat detectors are free of any extraneous insulating material (i.e., paint) that could retard or prevent response.
- (e) Smoke detectors are free of any condition (i.e. obstruction) that could prevent smoke from enter the sensing chamber of the detector.
- (f) All fire detection circuits are electronically supervised to provide indication (trouble alarm) of any identified faulted condition.
- (g) All functions of the fire alarm system are operational. These functions include supervision of all signaling line circuits, initiating devices' circuits, notification appliances circuits, and signal transmission circuits.

02.05 Protection from Damage from Fire Suppression Activities.

- a. Inspection Requirements. Ensure that the licensee/certificate holder maintains programs and procedures adequate to:
  - 1. Determine whether safety controls which are located in the same fire area are subject to damage from fire suppression activities, or from the rupture or inadvertent operation of fire suppression systems.
  - 2. Determine if a fire in a single location could, indirectly, through the production of smoke, heat, or hot gases, cause activation of automatic fire suppression which would potentially damage other safety controls (e.g., sprinkler-caused flooding of other controls).
  - 3. Determine if adequate drainage and environmental protection is provided in areas protected by water suppression systems.
- b. Inspection Guidance. No inspection guidance.

02.06 Undesired Consequences.

- a. Inspection Requirements. Ensure that the licensee/certificate holder maintains programs and procedures adequate to:
  - 1. Determine whether fire suppression agents (water or gaseous based) could impact nuclear criticality safety controls, and whether controls to prohibit such impacts meet requirements and are adequate.
  - 2. Determine whether the potential consequence(s) of cable failures, as a result of the fire suppression activities, has been adequately considered for safety controls in the area, including instrumentation and control cabling.

- b. Inspection Guidance. No inspection guidance.

02.07 Environmental Issues and Water Based Suppression Systems.

- a. Inspection Requirements. Ensure that the licensee/certificate holder maintains programs and procedures adequate to preclude release of any hazardous effluents as a result of fire fighting efforts.
- b. Inspection Guidance. Facilities used for the storage and dispensing of flammable and combustible liquids should have installed a containment system to catch any hazardous effluent that would result from the system activation and water runoff. When the sprinkler system activates, there is the possibility that the water would mix with the hazardous substance in the facility, and if unchecked can flow into nearby bodies of water or soak into nearby soil, threatening drinking water, etc. Depending on the type of fire, the run-off may be highly contaminated, and threaten nearby areas.

The problem of backflow to the city water source from which the suppression system draws its water is also a concern. Pollutants can pass from the system to the water supply through the normal backflow permitted by check valves. The pollutants come from the water pumped into the system through the fire department connection. If non-potable water (for example chemically treated water) used in the system flows back into the drinking water supply, there could be negative environmental and health effects on the surrounding area.

Another area of concern is when water, which has been sitting for years in a system and may contain microbes and corrosion products flows back into the public water supply. This is a health concern because the stagnant water could cause illness if consumed. To safeguard against this, the system should have backflow preventers on suppression systems. This keeps the water in the system from flowing back into the public water supply.

Another cause for concern would be the chemicals used in the systems, such as antifreeze solution. Antifreeze solutions are water solutions of ethylene glycol, diethylene glycol, glycerine, or propylene glycol. Most of them are hazardous to the environment and human health. When the system activates, the water mixed with hazardous chemicals in an antifreeze solution can flow into the sewer system, or to a water source (i.e. river), if no proper containment systems are provided. This can cause water pollution. It can also create land pollution if run-off flows into nearby soil. It might flow back into the water supply system and would present a serious problem.

Mold may result from water based fire protection equipment if the equipment is not properly maintained. Mold can grow inside system piping and, once discharged these microbes can cause environmental and health problems. If furniture and other items exposed to the water dousing are not dried properly, mold and bacteria can fester and grow, especially in porous materials such as flooring materials.

02.08 Communications.

- a. **Inspection Requirements.** Determine that the licensee/certificate holder maintains programs and procedures adequate to ensure that portable radio communications and/or fixed emergency communications systems are available, operable, adequate, and reliable for their required performance in fire response activities, and equipment would not be affected by a credible fire in the selected areas.
- b. **Inspection Guidance.** Assess the capability of the communication systems to support the operators in the conduct and coordination of their required actions (e.g., consider ambient noise levels, clarity of reception, reliability, and coverage patterns). If specific issues arise relating to fire brigade and incident commander communications adequacy, then observe that a licensee or certificate holder conducted communications tests in the subject plant area or areas. The tests should use a realistic scenario such as during audible alarm conditions. Review the battery use characteristics and duration for the fire brigade radios, and verify that the batteries are at least one hour rated (full charge) for talk and receive use. (If the batteries are not one hour rated, the radio batteries may not be acceptable for use for normal fire brigade response [nominal 20 minutes response time to place an effective fire suppression agent on simulated fires] or during a severe long-duration event).

02.09 Emergency Lighting.

- a. **Inspection Requirements.** Ensure that the licensee/certificate holder maintains programs and procedures adequate to ensure that emergency lighting would be available and operable when needed by:
  - 1. Determining whether the power distribution system contains protective devices so that a fire in the area will not cause loss of emergency lighting in any unaffected area needing lighting.
  - 2. Determining whether battery power supplies are rated with the hour capacity required by the code of record.
  - 3. Determining whether the operability testing and maintenance of the lighting units follow licensee procedures and manufacture's recommendations.
  - 4. Determining whether sufficient illumination is provided to permit access to and operation or verification of components for safety controls.
  - 5. Determining whether emergency lighting unit batteries are being maintained consistent with the manufacturer's recommendations.
- b. **Inspection Guidance.** Review emergency lighting provided, either in fixed or portable form, to determine whether the material condition of the equipment is being maintained and that any changes are appropriately reviewed with respect to the consequences of

the change. Determine if battery-powered backup lighting units are provided at the fire brigade storage locations and response assembly areas and whether that lighting is adequate to support fire brigade assembly and dress-out operations.

02.10 Fire Brigade Training and Offsite Fire Support Orientation.

- a. Inspection Requirements. Ensure that the licensee/certificate holder maintains programs and procedures adequate to maintain fire response capabilities by:
  1. Determining whether the fire brigade qualifications and training (including drills) meet the requirements of the license or certificate, and applicable procedures.
  2. Determining whether offsite fire support organizations are offered the opportunity for site orientation, and if they have received such orientation.
  3. Review changes to the licensee or certificate holder's training program to determine whether the licensee or certificate holder has in place a mechanism to update the facility's training program to incorporate management-approved recommendations that result from changes to IROFS, and other radiological, criticality safety, emergency preparedness, and nuclear chemical process safety program elements (e.g., hazard identification and assessment; management of change; incident investigation and audits) pertaining to fire brigade training.

b. Inspection Guidance.

1. The inspector should determine if the organization, training, qualifications, and equipment of the fire brigade are adequate to respond to the credible fire scenarios identified in the Radiological Contingency Emergency Plan, with assistance from offsite fire departments.

NFPA 600, "Standard on Industrial Fire Brigades," and NFPA 1081, "Standard for Industrial Fire Brigade Member Professional Qualifications" describe the requirements for the organization, training, and personal protective equipment of fire brigades whenever they are established by the employer. NFPA 600 and 1081 should be used for guidance.

All members of the fire brigade should receive adequate training. The inspector should review documentation of the meetings held, subjects taught, examinations given, and names of the attendees. The training should include:

- (a) Use of thermal protective clothing during firefighting operations, and practice with the clothing to ensure the clothing is correctly put on, worn, and removed.
- (b) Use of self contained breathing apparatus.
- (c) Implementation of the site-specific Pre-Fire Plan.

- (d) Manual fire suppression activities.
  - (e) Forced entry into a structure or confined space.
  - (f) Overhaul of a fire scene, so that structural integrity is not compromised, all hidden fires are discovered, fire cause evidence is preserved, and the fire is extinguished.
  - (g) Exit of a hazardous area.
  - (h) Establishment of a water supply for fire-fighting operations.
  - (i) Interface with offsite fire departments.
  - (j) Emergency medical care.
  - (k) Search and rescue operations.
  - (l) Fire fighting techniques for different hazards that might be present at the facility.
  - (m) Participation in a drill at least semiannually.
  - (n) Live fire training should be conducted at least annually. Live fire training shall include props that are representative of, and that simulate as closely as possible the hazards and conditions that could be encountered by the industrial fire brigade member.
2. The licensee or certificate holder must have in place a mechanism for ensuring that recommendations from other process safety program elements (hazard identification and assessment, incident investigation, management of change, and audit programs) pertaining to employee training are incorporated into the training program. For example:
- (a) A tracking system to ensure that each recommendation is addressed on a timely basis. The inspector should cross-check with the features of the tracking system identified in the hazard identification and assessment element.
  - (b) Management-approved findings, from incident investigations or audit programs, that highlight deficiencies in the fire brigade training program, should be addressed in a timely manner. The inspector should cross-check with the incident investigation and audit elements.
  - (c) Training actions activated by management of change procedures should be addressed before the change is implemented. All personnel affected by the change should undergo training.

## 02.11 Identification and Resolution of Problems.

- a. Inspection Requirements. Determine whether the licensee or certificate holder is identifying safety control or IROFS fire protection operability problems at an appropriate threshold and entering them into the corrective action program.
- b. Inspection Guidance.
  1. Program Implementation.

Use direct observation of operations, discussions with relevant plant staff, and a sample review of applicable documentation to determine the information below. Inspectors should consider licensee or certificate holder identified issues (e.g., issues identified during audits or self assessments) and issues identified through an employee concerns program, if applicable:

- (a) Determine whether equipment, human performance, and program issues are being identified by the licensee or certificate holder at an appropriate threshold, and are being entered into the problem identification and resolution program.
- (b) Determine whether corrective actions commensurate with the significance of the issue have been identified and implemented by the licensee.
- (c) If applicable, determine whether the licensee or certificate holder is implementing a program for facility systems inspection (normally done on a shift or daily basis), or as otherwise required by the license or certificate conditions and implementing procedures.
- (d) Perform a screening review of items entered into the corrective action program. The intent of this review is to be alert to conditions, such as repetitive equipment failures or human performance issues that might warrant additional follow-up through this inspection procedure or other core inspection procedures. It is not intended that the results of this review be documented or that inspectors follow-up each item, only that the inspector should be alert for trends and risk significant or repetitive failures.
- (e) Review a sample of issues to determine whether the licensee or certificate holder has appropriately classified the issue, and has taken appropriate short- and long-term corrective actions.
- (f) Determine whether the licensee or certificate holder has conducted periodic reviews, audits, and assessments to ensure that safety commitments in the license or certificate are assessed at an appropriate frequency.

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70 licensees are required to maintain records of IROFS or management measures that have failed to perform their function upon demand, or have degraded such that the performance requirements are not satisfied. These records should be readily retrievable and inspected. These records should identify the IROFS or management measure that has failed and the safety function affected, the date of discovery, date (or estimated date) of the failure, duration (or estimated duration) of the time that the item was unable to perform its function, any other affected IROFS or management measures and their safety function, affected processes, cause of the failure, whether the failure was in the context of the performance requirements or upon demand or both, and any corrective or compensatory action that was taken. A failure should be recorded at the time of discovery, and the record of that failure updated promptly upon the conclusion of each failure investigation of an IROFS or management measure (10 CFR Part 70.62[a][3]).

2. Event Review.

- (a) Determine whether the licensee or certificate holder has implemented a program to review events that meets license or certificate requirements for evaluating safety-significant events. Review the events occurring since the last IP 88054 inspection to determine compliance with the license or certificate including, as appropriate:
  - (1) The prompt review and evaluation of non-routine events and unusual occurrences;
  - (2) Assessing the significance of non-routine events and unusual occurrences, and reporting them, both internally, and to the NRC;
  - (3) Evaluation of extent of condition of findings; and
  - (4) Assuring completion of corrective actions related to non-routine events and unusual occurrences.

3. Audits.

- (a) Select internal or contracted audits performed since the previous IP 88054 inspection, and examine the records documenting selected audits to determine whether there was a written plan for the audit, the audit adequately reviewed the audited area, appropriate corrective actions were taken whenever deficiencies were found, and whether there was a check of the effectiveness of the corrective action.
- (b) Determine by interviewing the licensee or certificate holder representatives, how the licensee or certificate holder ensures the effectiveness of audits, such as by using a contractor to perform the audit,

or using a secondary (or follow-up) audit system on a periodic basis, conducted by a member of management or a senior technician not directly responsible for the system audited.

02.12 Organizational Structure.

- a. Inspection Requirements. Perform discussions with licensee or certificate holder staff and management representatives, and review documentation, determine whether the licensee's or certificate holder's organizational structure is in accordance with the license or certificate.
- b. Inspection Guidance. Discuss with licensee or certificate holder representatives any organizational changes, structural changes, and/or changes in personnel responsibilities and functions that have occurred since the last IP 88054 inspection. Determine whether the individuals who made the changes were qualified to make them, and whether the changes were approved by NRC's appropriate licensing branch, or as required by the license, certificate, or the licensee's or certificate holder's procedures.

Review licensee's or certificate holder's procedures that govern the types of changes specified above. Determine whether these procedures were properly implemented to effect the changes made. Focus on whether the qualifications of involved plant staff meet the requirements of the license or certificate, including years of relevant experience, educational background, and training required for the newly assigned responsibilities.

Changes in organization and organizational structure need only be examined with particular attention to changes in personnel, qualifications of personnel, functions, responsibilities, and authorities. If no significant changes have occurred in the organization since the previous IP 88054 inspection, then the inspection report should state that there have been no significant changes in the organization since the previous IP 88054 inspection.

02.13 Training Compliance with License or Certificate Requirements.

- a. Inspection Requirements. As applicable, confirm compliance with license, certificate conditions, or local procedural requirements relating to implementation of training for operators in the area of fire protection, including:
  1. IROFS or safety controls. Select a sample of risk-significant administrative or safety controls that limit the risk of a credible high consequence and/or intermediate consequence event (10 CFR 70.61[b] and [c]), and determine through interviews whether operators understand why the control(s) are needed and IROFS available and reliable to perform their intended function (10 CFR 70.61[e]), and whether operators understand why safety controls are required to be available to perform their intended safety functions according to requirements in the Safety Analysis Report.
  2. Fire Safety for Operators.

- b. Inspection Guidance. Specific regulatory requirements related to the licensee's or certificate holder's training program will be contained in license or certificate conditions. In addition, training for administrative controls that are IROFS is required by 10 CFR 70.62(d) to ensure the IROFS is available and reliable. The license or certificate may require the licensee or certificate holder to implement a training program described in their application.
1. In evaluating the implementation of the approved or required program, pay attention to completion of requirements related to initial training, periodic retraining, on-the-job training, and tests and examination of trainees.
  2. Select and examine records of initial training for new employees in a variety of workers, including tests or exams (if tests are required by the program).
  3. Examine a selection of retraining records for experienced employees for a variety of workers including tests or exams (if tests are required by the program).
  4. Discuss the training program with one or more supervisors and one or more operators or technicians selected at random, to review their participation in the training program as it compares to their training records.
  5. Discuss the program with the licensee's or certificate holder's representative charged with the responsibility for training. Discuss any changes made since the last inspection, and determine whether substantive changes were reviewed and approved by management and, if required, by the NRC. Review and discuss the licensee or certificate holder's evaluation of the overall effectiveness of the training program. The inspection should be directed at assessing how well the training program addresses the fire safety aspects of hazards that can affect special nuclear material at the facility. The principal objective of the training program is to ensure that employees have been adequately prepared to perform their job tasks in a safe and effective manner.

#### 88054-03 RESOURCE ESTIMATE

The resource estimate to perform this inspection is estimated to be 90 hours every three years.

#### 88054-04 REFERENCES

##### 04.01 National Fire Protection Association (NFPA) Codes.

NFPA 10, "Portable Fire Extinguishers."

NFPA 11, "Low Expansion Foam and Combined Agent Systems."

NFPA 11A, "Medium- and High-Expansion Foam Systems."

NFPA 12, "Carbon Dioxide Extinguishing Systems."

NFPA 12A, "Halon 1301 Fire Extinguishing Systems."

NFPA 12B, "Halon 1211 Fire Extinguishing Systems."

NFPA 13, "Sprinkler Systems."

NFPA 14, "Standpipe and Hose Systems."

NFPA 15, "Water Spray Fixed Systems for Fire Protection."

NFPA 16, "Deluge Foam-Water Sprinkler and Foam-Water Spray Systems."

NFPA 20, "Centrifugal Fire Pumps."

NFPA 24, "Private Fire Service Mains and Their Appurtenances."

NFPA 30, "Flammable and Combustible Liquids Code."

NFPA 31, "Oil Burning Equipment."

NFPA 37, "Stationary Combustion Engines and Gas Turbines."

NFPA 45, "Laboratories Using Chemicals."

NFPA 50, "Bulk Oxygen Systems at Consumer Sites."

NFPA 50B, "Liquefied Hydrogen Systems at Consumer Sites."

NFPA 51B, "Fire Prevention in Use of Cutting and Welding Processes."

NFPA 54, "ANSI Z223.1-1984, National Fuel Gas Code."

NFPA 69, "Explosion Prevention Systems."

NFPA 70, "National Electrical Code."

NFPA 70B, "Electrical Equipment Maintenance."

NFPA 70E, "Electrical Safety Requirements for Employee Workplaces."

NFPA 72D, "Proprietary Protective Signaling Systems."

NFPA 72E, "Automatic Fire Detectors."

NFPA 75, "Electronic Computer/Data Processing Equipment."

NFPA 77, "Static Electricity."

NFPA 78, "Lightning Protection Code."

NFPA 79, "Industrial Machinery."

NFPA 80, "Fire Doors and Windows."

NFPA 80A, "Protection of Buildings from Exterior Fire Exposures."

NFPA 85D, "Fuel Oil-Fired Multiple Burner Boiler-Furnaces."

NFPA 86C, "Industrial Furnaces Using a Special Processing Atmosphere."

NFPA 90A, "Air Conditioning and Ventilating Systems."

NFPA 90B, "Warm Air Heating and Air Conditioning Systems."

NFPA 101, "Life Safety Code."

NFPA 204M, "Smoke and Heat Venting."

NFPA 220, "Types of Building Construction."

NFPA 251, "Fire Tests of Building Construction and Materials."

NFPA 321, "Basic Classification of Flammable and Combustible Liquids."

NFPA 482, "Production, Processing, Handling and Storage of Zirconium."

NFPA 600, "Private Fire Brigades."

NFPA 801, "Facilities Handling Radioactive Materials."

NFPA 803, "Light Water-Cooled Nuclear Reactors."

#### 04.02 U.S. Nuclear Regulatory Commission Documents.

U.S. Nuclear Regulatory Commission, "Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities," NUREG 0762, Rev. 1, November 1987.

U.S. Nuclear Regulatory Commission, Standard Review Plan 9.5.1, "Guidelines for Fire Protection for Nuclear Power Plants," NUREG 0800, Rev. 2, July 1981.

U.S. Nuclear Regulatory Commission, "Guidance on Management Controls/Quality Assurance, Requirements for Operation, Chemical Safety, and Fire Protection for Fuel Cycle Facilities," Federal Register, Vol, 54, No. 53, March 1989.

#### 04.03 Other Documents.

American National Standards Institute, N665-1985, "Facilities for Fabricating Fuel for Light Water Reactors (LWR) - Fire Protection."

American National Standards Institute/American Society of Heating, Refrigeration, and Air Conditioning Engineers, ANSI/ASHRAE 15, "Safety Code for Mechanical Refrigeration."

American Society for Testing and Materials, ASTM E-84, "Surface Burning Characteristics of Building Materials," 1976.

American Society for Testing and Materials, ASTM E-119, "Fire Test of Building Construction and Materials," 1976.

Factory Mutual System Approval Guide, "Equipment, Materials, Services for Conservation of Property."

National Fire Protection Association, Fire Protection Handbook.

Underwriters Laboratories Standard UL 555, "Standard for Fire Dampers and Ceiling Dampers."

Underwriters Laboratories Standard UL 586, (ANSI B 132.1), "High-Efficiency Air Filtration Units."

Underwriters Laboratories, Building Materials Directory.

#### 88054-05      PROCEDURE COMPLETION

Implementation of each applicable inspection requirement will constitute completion of this procedure. Individual inspection samples and breadth of review will be determined by the inspector based on requirement compliance, risk-significance of activity, and extent of the activity or records available.

END

Attachment:

Revision History for IP 88054

Attachment 1 - Revision History for IP 88054

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completin Date	Comment Resolution Accession Number
N/A	09/11/08 CN 08-026	<p>Researched commitments for 4 years and found none.</p> <p>IP 88054 has been issued because of the need for a new Inspection Procedure for the Fire Protection Program.</p>	No	ML082330199
N/A	ML13233A185 03/06/14 CN 14-007	<p>This document has been significantly revised to update the format according to new MC 0040 standards. Redundant information between the requirements and guidance sections has been removed to increase efficiency. Minor grammar edits have been completed. Additional information regarding the PI&amp;R section has been added from IP 88005. Additional training information has been added from IP 88010. See Word document</p>	No	ML13347A984