

September 29, 1998

JMHLTR: #98-0252

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555



Subject: Dresden Nuclear Power Station Unit 2 and 3
Self-Assessment of the Fire Protection Program
NRC Docket Number 50-237 and 50-249

Reference: (a) NRC Inspection Manual Chapter 2515

Enclosure: (1) Fire Protection Functional Inspection Assessment/Audit Plan
QAA 12-98-04
(2) R. Speak memo to P. Chabot dated September 25, 1998 –
Qualification of Auditors.

The purpose of this letter is to inform you of a planned self-assessment of the Fire Protection Program at Dresden Nuclear Power Station that began on September 28, 1998. This notification will provide the NRC with the opportunity to evaluate that self-assessment, and to adjust resources for any similar inspection effort you may be planning in the future.

Reference (a) states that the Regional Administrator with concurrence of the Director, Inspection and Support Programs may delay or not perform a generic team inspection at a specific site or facility. This decision is based upon licensee performance and self-assessment capability in a given area.

The self-assessment is scheduled from September 28, 1998 to October 30, 1998, and has been discussed with members of your staff.

The detailed scope of the assessment is described in Enclosure (1) and includes the following:

- A Fire Protection Functional Inspection (FPFI), based on NRC Functional Inspections, recently performed at the Prairie Island and River Bend Nuclear facilities which meet the Station's annual requirement to perform a Safety System Functional Inspection (SSFI).
- A review of approximately 200 Quad Cities Fire Protection issues for applicability to Dresden Station, as delineated in NEXUS Report 98-3002.
- A review of the Individual Plant Examination of External Events (IPEEE) assessment of fire protection vulnerabilities, submitted to the NRC in December 1997.

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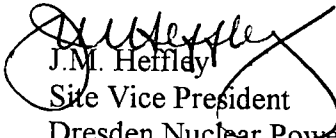
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Hooks

- A review of effectiveness of Corrective Actions from previous Dresden Fire Protection Audit findings.

A team of at least five individuals from ComEd and four Nexus contractors will conduct the assessment/audit. The qualifications of the auditors are described in enclosure (2).

If you have any questions, please contact Frank Spangenberg, Dresden Regulatory Assurance Manager at (815) 942-2920 extension, 3800.

Sincerely,


J.M. Heffley
Site Vice President
Dresden Nuclear Power Station

cc: Director, Inspection and Support Programs
Administrator Region III
NRC Resident Inspector, Dresden Nuclear Power Station

**Dresden Station
Audit Notification and Plan
Site Nuclear Oversight Audit QAA 12-98-04
FIRE PROTECTION**

To: P. Swafford
Station Manager
Dresden Station

Subject: Fire Protection Functional Inspection Assessment/Audit QAA 12-98-04

Purpose and Scope:

During the period of September 28, 1998, through October 30, 1998, Dresden Nuclear Oversight, in a collaborative effort with both Site Engineering and Corporate Fire Protection will perform an assessment of the Fire Protection Program. This assessment will meet the requirements of a biennial audit as directed by Generic Letter 82-21. Several other functions will be accomplished during this major review of the Fire Protection Systems and Programs:

- A Fire Protection Functional Inspection (FPFI), which meets the Station's annual requirement to perform a Safety System Functional Inspection (SSFI),
- A Self Assessment meeting the requirements of NSP-AP-3009,
- A review of the Quad Cities Fire Protection issues applicable to Dresden Station (approx. 200 issues), as delineated in the NEXUS Report 98-3002,
- A review of the Individual Plant Examination of External Events (IPEEE) assessment of fire protection vulnerabilities, submitted to the NRC 12/97, and
- A review of effectiveness of Corrective Actions from previous Dresden Fire Protection Audit findings.

The FPFI is based on an NRC Functional Inspection, recently performed at the Prairie Island and River Bend Nuclear facilities.

Three fire protection consultants from Nexus Technical Services Corporation (NTSC) will focus on issues related to the FPFI. This shared resource audit will also include Station Engineering personnel and Auditors from other ComEd locations. Administrative support will be provided by the station for document retrieval and issue tracking similar to a major NRC Inspection. Since this audit will involve a large variety of station and corporate personnel and cover several fire protection systems and programs, special attention will be provided to ensure no conflict of interest exists.

This performance based audit will include a review of modifications that can affect fire protection, fixed and transient fire loading, maintenance of fire protection equipment, fire barrier impairments and repairs, special permit procedures, fire emergency preparedness, plant personnel fire protection training, and effectiveness of past corrective actions. A review of Unit 1 fire protection equipment and programs will also be performed.

Audit Team:

The audit team will include the following personnel:

| | |
|-----------------|---|
| Bob Speek | Audit Team Leader |
| Ken Housh | Auditor (N.O.) |
| Stan Chingo | Technical Specialist (Downers Grove-Fire Protection) |
| Dan Roberts | Technical Specialist (Downers Grove-Nuclear Generation Support) |
| Dick Todd | Technical Specialist (QC) |
| Jack Steiner | Technical Specialist (Eng.) |
| Keith Parkinson | Technical Specialist (Nexus) |
| Tom Casey | Technical Specialist (Nexus) |
| Steve Einbinder | Technical Specialist (Nexus) |

Audit References:

The audit will be conducted using an approved checklist containing selected questions from the following references:

- 10 CFR 50 (50.48, 50.54), Appendices B and R;
- Generic Letters 82-21, 88-20;
- Branch Technical Position 9.5-1;
- ComEd QA Manual;
- Dresden Station UFSAR, Vol. 1-6;
- NFPA Code (1975) Section 27,
- IPEEE Submittal to NRC dated 12/97
- Nexus Report 98-3002
- Dresden Administrative Technical Specifications (DATRs),
- Selected Dresden Procedures (DAPs, DHPs, DFPS, DFPP, DES, DOA)

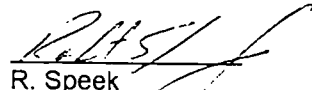
Also, Corrective Action Records (CARs) from recent Dresden Fire Protection audits and the PIF Database were reviewed for applicability to this audit:

Organizations to be Notified:

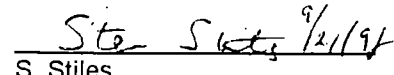
Fire Marshal
Operations
Safety/Loss Prevention
Work Control
Electrical Maintenance
System Engineering
Design Engineering
Training

An Entrance Meeting is scheduled for 09:00 in Room 215 on 9/28/98. An exit meeting to discuss the results of this audit is scheduled for October 30, 1998 at 14:00 in Room 215 of the Admin Building.

Prepared by:


R. Speek
Audit Team Leader
Dresden Station

Approved by:


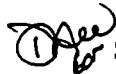

S. Stiles
N.O. Assessment Manager
Dresden Station

cc: N.O. Manager/Dual File Storage
Site Vice-President/Heffley
Executive Assistant/Ambler
Operations Manager/Barrett
Site Engineering Manager/Chabot
Plant Engineering Supt./Willis
Design Engineering Supt./Peak
Maintenance Manager/Fisher
Electrical Maintenance Supt./ Ponce
Station Outage & Work Control Manager/Randich
Training Manager/ Almon
Fire Marshal/Burns
Site N.O. Manager/Winchester
Corrective Actions Supervisor/Weidner
Nuclear Duty Officer/Leggett
Audit Team
Audit File (Hardcopy)

Memorandum



Q&SA# 12-98-025 Rev 1

Date: September 25, 1998
TO: P. Chabot
Site Engineering Manager
FROM:  R. Speak
Audit Team Leader, QAA 12-98-04 – Fire Protection
VIA:  S. Stiles
Assessment Manager
RE: Qualifications for Auditors

Based on previous discussions you indicated a potential concern regarding the qualifications of the audit team. Specifically would the team meet the requirements for a Self Assessment (Station) performance of a Fire Protection Functional Inspection (FPFI).

NRC Letter SECY-96-267 to the Commissioners from James M. Taylor, Executive Director for Operations states in part:“A typical FPFI team will consist of a qualified team leader and four qualified inspectors. The team leader will be a senior fire protection engineer or equivalent. The team will consist of a fire protection engineer, an electrical engineer, a plant systems engineer, and a regional inspector”.....

Our Fire Protection Audit team will consist of at least nine auditors. The credentials held by the team members meets or exceed the requirements listed by this reference

Further guidance is provided in NRC Inspection Manual – Temporary Instruction 2515/XXX, Fire Protection Functional Inspection. Appendix G of this document, Team Makeup and Qualifications, indicates that the NRR Team Leader and regional representatives shall be NRC employees, and that the PRA Analyst, Reactor Systems, Mechanical Systems Engineer, Electrical Engineer and Fire Protection Engineer may be either NRC employees or NRR Contractor personnel.

The Dresden Audit Team will include (and may not be limited to) the following:

Team Leadership will be shared between R. Speak (for the audit portion) and J. Steiner (for the Self-Assessment portion). Both are ComEd employees.

- Bob Speak: Nuclear Oversight Audit Team Leader, SRO, and former fire brigade leader/member.
- Jack Steiner: M.S. Electrical Engineering (Ohio State), FP Design Engineer.

Nexus will be providing at least three consultants, all with extensive fire protection experience.

- Steve Einbinder: B.S. Fire Protection and Safety Engineering – Professional Engineer – 18 years experience in regulatory compliance issues at nuclear plants.

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ENCLOSURE 2

- Thomas Casey: B.S. Electrical Engineering (Northeastern University), Post Graduate Studies, Nuclear Engineering (MIT), Fault Tree Analysis (George Washington University), SRO
- Keith Parkinson: B.S. Electrical Engineering (Purdue), SRO, former NRC Post Fire Safe Shutdown Team Inspector (21 commercial nuclear plants).
- Tom McCormack: B.S. Fire Protection and Safety Engineering (IIT), over 15 years fire protection experience, including two mock FPFIs.

Additionally, Dresden will be providing at least two additional team members. Ken Housh is a member of Nuclear Oversight, and is a former Fire Protection Engineer, with a B.S. in Mechanical Engineering (Bradley University). Dick Todd is a member of Quality Control with extensive plant experience. Terry Severson is also with QC, and will be assisting on afternoon shifts during the first part of the audit. Additionally, Downers Grove will be providing Fire Protection Specialists as a part of this audit team. They will include Stan Chingo and Dan Roberts, both with extensive fire protection experience.

I have attached copies of resumes for the individuals specified above (resumes for Downers personnel pending). Additionally, I have provided a copy of Appendix G, which provides the best reference available for FPFi qualification requirements. Copies of the resumes for audit participants will remain as part of the audit file. Based on these qualifications, I believe that our team meets all the requirements listed above. If you have any other questions in this matter, please contact me.

cc: file
Manager, N.O./Dual file storage

cc: w/o attachments

Dennis Winchester, N.O.
Jack Steiner, Design Engineering
Tom McCormack, Nexus