



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

October 26, 2017

Mr. Keith Polson, Senior VP
and Chief Nuclear Officer
DTE Energy Company
Fermi 2 – 210 NOC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI POWER PLANT, UNIT 2—TRIENNIAL FIRE PROTECTION INSPECTION
REPORT 05000341/2017012

Dear Mr. Polson:

On September 14, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed a Triennial Fire Protection Inspection at your Fermi Power Plant, Unit 2 (Fermi 2). The enclosed inspection report documents the inspection results, which were discussed on September 25, 2017, with Mr. K. Polson, 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.

No findings were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

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

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

Enclosure:
IR 05000341/2017012

cc: Distribution via LISTSERV®

Letter to Keith Polson from Robert C. Daley dated October 26, 2017

SUBJECT: FERMI POWER PLANT, UNIT 2—TRIENNIAL FIRE PROTECTION INSPECTION
REPORT 05000341/2017012

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REGION III

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

Report No: 05000341/2017012

Licensee: DTE Energy Company

Facility: Fermi Power Plant, Unit 2

Location: Newport, MI

Dates: August 14, 2017, through September 25, 2017

Inspectors: A. Dahbur, Senior Reactor Inspector (Lead)
J. Robbins, Reactor Inspector
A. Shaikh, Senior Reactor Inspector

Observer: P. Smagacz, Resident Inspector

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

Enclosure

SUMMARY

Inspection Report 05000341/2017012; 08/14/2017—09/25/2017; Fermi Power Plant, Unit 2; Routine Triennial Fire Protection Baseline Inspection.

This report covers a 2-week announced Triennial Fire Protection Baseline Inspection. The inspection was conducted by Region III based engineering inspectors. The U.S. Nuclear Regulatory Commission's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 6, dated July 2016.

NRC-Identified and Self-Revealed Findings

No findings were identified.

Licensee-Identified Violations

No violations were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events and Mitigating Systems

1R05 Fire Protection (71111.05T)

The purpose of the Triennial Fire Protection 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 shut-down (SSD) 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 SSD; 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 SSD systems for selected risk-significant fire areas. Inspector emphasis was placed on determining that the post-fire SSD capability and the fire protection features were maintained free of fire damage to ensure that at least one post-fire SSD 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 Title 10 of the *Code of Federal Regulations* (CFR), Part 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 areas and B.5.b mitigating strategies selected for review during this inspection are listed below and in Section 1R05.13. The fire areas selected constituted three inspection samples and the B.5.b mitigating strategies selected constituted two inspection sample, respectively, as defined in Inspection Procedure 71111.05T.

Fire Area	Description
02AB	Auxiliary Building Mezzanine and Cable Tray Area
13AB	Auxiliary Building Ventilation Area
11ABE	Division I Miscellaneous Room Elevation 643

.1 Protection of Safe Shutdown Capabilities

a. Inspection Scope

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

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 SSD analysis and procedures.

b. Findings

No findings were identified.

.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 and supporting fire tests. In addition, the inspectors reviewed license documentation, such as U.S. Nuclear Regulatory Commission (NRC) Safety Evaluation Reports, and deviations from NRC regulations and National Fire Protection Association 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.

The inspectors reviewed the installation, repair, and qualification records for a sample of penetration seals to ensure the fill material was of the appropriate fire rating and that the installation met the engineering design.

b. Findings

No findings 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 National Fire Protection Association standards to verify that fire suppression and detection systems met license commitments. The inspectors reviewed fire brigade drill records and walked down pre-fire plans for select areas.

b. Findings

No findings were identified

.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 were identified.

.5 Alternative Shutdown Capability

a. Inspection Scope

The inspectors reviewed the licensee's systems required to achieve alternative SSD to determine if the licensee had properly identified the components and systems necessary to achieve and maintain SSD 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 SSD procedure actions and that equipment labeling was consistent with the alternate SSD procedure. The review also looked at operator training as well as consistency between the operations shutdown procedures and any associated administrative controls.

b. Findings

No findings were identified

.6 Circuit Analyses

a. Inspection Scope

The inspectors verified that the licensee performed a post-fire SSD analysis for the selected fire areas and the analysis appropriately identified the structures, systems, and components important to achieving and maintaining SSD. Additionally, the inspectors verified that the licensee's analysis ensured that necessary electrical circuits were properly protected and that circuits that could adversely impact SSD due to hot shorts, shorts to ground, or other failures were identified, evaluated, and dispositioned to ensure spurious actuations would not prevent SSD.

The inspectors' review considered fire and cable attributes, potential undesirable consequences, and common power supply/bus concerns. Specific items included the credibility of the fire threat, cable insulation attributes, cable failure modes, and actuations resulting in flow diversion or loss of coolant events.

The inspectors also reviewed cable raceway drawings for a sample of components required for post-fire SSD to verify that cables were routed as described in the cable routing matrices.

The inspectors reviewed circuit breaker coordination studies to ensure equipment needed to conduct post-fire SSD activities would not be impacted due to a lack of coordination. Additionally, the inspectors reviewed a sample of circuit breaker maintenance records to verify that circuit breakers for components required for post-fire SSD were properly maintained in accordance with procedural requirements.

The inspectors verified for cables that are important to SSD, but not part of the success path, and that do not meet the separation/protection requirements of Section III.G.2 of 10 CFR Part 50, Appendix R, that the circuit analysis considered the cable failure modes. In addition, the inspectors have verified that the licensee has either:
(1) determined that there is not a credible fire scenario (through fire modeling),
(2) implemented feasible and reliable manual actions to assure SSD capability, or
(3) performed a circuit fault analysis demonstrating no potential impact on SSD capability exists.

b. Findings

No findings 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 SSD 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 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 SSD functions. As part of the walkdowns, 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 were identified.

.9 Cold Shutdown Repairs

a. Inspection Scope

For the three fire areas that were selected, the licensee did not credit any repairs in order to achieve cold shutdown. Therefore, no reviews were performed by the inspectors for this procedure section.

b. Findings

No findings 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 SSD equipment, systems, or features (e.g., detection and suppression systems, and equipment, passive fire barriers, pumps, valves or electrical devices providing SSD functions or capabilities). The inspectors also conducted a review of 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 were identified.

.11 Review and Documentation of Fire Protection Program Changes

a. Inspection Scope

The inspectors reviewed changes to the approved Fire Protection Program to verify that the changes did not constitute an adverse effect on the ability to safely shutdown. 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 SSD analysis and procedures.

b. Findings

No findings were identified.

.12 Control of Transient Combustibles and Ignition Sources

a. Inspection Scope

The inspectors reviewed the licensee's 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. A sample of hot work and transient combustible control permits were also reviewed. The inspectors performed plant walkdowns to verify that transient combustibles and ignition sources were being implemented in accordance with the administrative controls.

b. Findings

No findings were identified.

.13 B.5.b Inspection Activities

a. Inspection Scope

The inspectors reviewed the licensee's preparedness to handle large fires or explosions by reviewing selected mitigating strategies. 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 2515/171 or subsequent performances of these inspections.

The B.5.b mitigating strategies selected for review during this inspection are listed below. The offsite 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 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)
3.4.8	Venting Primary Containment without AC Power (A.5-8)
3.4.9	Drywell Injection (A.5-9)

b. Findings

One finding was identified which is discussed in Inspection Report 05000341/2016407.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems (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 were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. M. Caragher, Mr. K. Polson, and other members of the licensee staff on September 14, 2017, and on September 25, 2017, respectively. 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

K. Polson, Site Vice President
M. Caragher, Executive Director, Nuclear Production (Plant Manager)
L. Bennett, Director, Nuclear Operations
W. Colonnello, Nuclear Projects
K. Dittman, Plant Support Engineering
A. Emerson, Engineering
R. Harris, Fire Protection, Plant Support Engineering
K. Hullum-Lawson, Manager, Plant Support Engineering
J. Louwers, Manager, Nuclear Quality Assurance
S. Maglio, Manager, Licensing
K. Mann, Supervisor, Regulatory Compliance
J. May, Manager, Chemistry
D. Noetzel, Director, Nuclear Engineering
M. O'Connor, Manager, Security
K. Polson, Site Vice President
G. Strobel, Director, Outage & Work Management
P. Summers, Director, Nuclear Support
S. Wood, Plant Support Engineering

U.S. Nuclear Regulatory Commission

J. Nance, Acting Senior Resident Inspector
P. Smagacz, Resident Inspector

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened, Closed and Discussed

None

LIST OF ACRONYMS USED

CFR	<i>Code of Federal Regulations</i>
NRC	U.S. Nuclear Regulatory Commission
SSD	Safe Shutdown

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.

CALCULATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
DC-5713	Hydraulic Evaluation of the Fire Distribution Loop, Volume I	E
DC-2574	Emergency Lighting for Appendix R Fire Protection and Station Blackout	P
DC-4921	Volume I, Appendix R Calculations	H
TE-A30-17-063	Flange Rigging Plan	0

CORRECTIVE ACTION PROGRAM DOCUMENTS ISSUED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
17-26214	Control Room Envelope Damper Access Panel Screws Missing	08/15/2017
17-26847	Aluminum drip pan found behind MPU 3	08/15/2017
17-26857	Yellow Herculite material attached to conduit penetrations	08/15/2017
17-26871	NRC FP Triennial: Trash left in area	08/15/2017
17-26948	Identification methods for non-required fire wrapping	08/18/2017
17-26953	Repair AB4 Ventilation Rm Gypsum Wall	08/18/2017
17-27016	Radio equipment not tagged for extended use	08/25/2017
17-27116	Repair Penetration P-150	08/25/2017
17-27117	Cable Tray Fire Wrap 2C-012 Needs Repaired	08/25/2017
17-27118	PVC Piping in MCC Area 3rd Floor Aux Building	08/25/2017
17-27136	AB-4 Block wall mortar joint needs repair	08/25/2017
17-27137	Review of IN13-06 response	08/25/2017
17-27146	Fire Penetration Seal T2235X110 Needs Repair	08/25/2017
17-27147	Potential Inadequate Remedial Actions and Extent of Condition for CARD 14-26765	08/25/2017
17-27148	Review FPEE-16-0001 to determine if the addition of steps to 20.000.18 have an impact on time critical operator actions	08/25/2017
17-27149	Recommendation to Review MSO Report for addition of additional MSO Scenarios	08/25/2017
17-27150	Revise FPEEs	08/26/2017
17-27173	Conduit wrapped in silver duct tape	08/25/2017
17-27206	Enhancement to operator manual feasibility	08/25/2017
17-27207	Investigate Feasibility of Actions from CARD 14-27205	08/25/2017
17-27226	Enhance Seal Spec 3071-198	08/29/2017
17-27230	Lack of Documentation in DC-4921 related to implementation of MSO Modification	08/29/2017
17-27236	Pre-Fire plans does not have all the communications	08/29/2017
17-27243	29.EDM.10 Dedicated scaffolding	08/29/2017
17-27290	Fire Door R3-12 Does Not Close Automatically	08/31/2017
17-27334	Enhancement to 20.000.18	08/31/2017

CORRECTIVE ACTION PROGRAM DOCUMENTS ISSUED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
17-27595	Instrument accuracy is not included in the acceptance criteria for 28.504.04	09/12/2017
17-27596	DC-5713 contains an error used in acceptance criteria 28.504.04	09/12/2017
17-27624	Verify Fire Penetration Seals	09/12/2017

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
14-27202	DC-4921 Discrepancy Regarding Fire Zone 04AB1	09/11/2014
14-27205	Evaluate Additional Manual Isolation Point for SBFW	09/11/2014
16-29698	Difference in Review Standard for III.G.2 and III.G.3	12/06/2016
17-24219	One Hour Fire Rated Barrier Not Sealed	05/05/2017
16-23351	Errors in Door Classification Procedures Leads to Misclassification of Door T3-6	04/22/2016
17-00767	Diesel Fire Pump Failed to Start	08/21/2017

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
6I721-2095-04	Schematic Diagram – ADS Valves	V
6M721-5737	Stand-By Gas Treatment System Functional Operating Sketch	AA
6I721-295-02	Automatic Depressurization System Sol. Valves B2104F013J, P&R	Q
6I721-2095-06	Automatic Depressurization System Control Logic A	J
6I721-2095-07	Automatic Depressurization System Control Logic A	J
6A721-2400	Fire Protection Evaluation Plot Plan	P
6A721-2407	Fire Protection Evaluation Reactor and Auxiliary Building Third Floor Plan	S
6SD721-2500-01	One Line Diagram Plant 4160V and 480V System Service	BM
6SD721-2500-03	One Line Diagram Plant 4160V System Service Buses 64B, 64C	S
6SD721-2500-04	One Line Diagram Plant 4160V System Service Buses 65E, 65F, 65G	T
6SD721-2500-04	One Line Diagram Plant 4160V System Service Buses 65A, 65D, 65L	AH
5SD721F-0024A	One Line Diagram 480V AC 30, 120/240 AC 10 and 125V DC Buses C.T.G. #11-1	C
6M721-5988	Operator Time Critical Actions and Design Basis Sheet 1	D
4A721-4020	Cable Tray Fire Breaks Reactor-Aux. Bldg	A

PRE-FIRE PLANS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
FP-AB-1-6d	Pre-Fire Plan Auxiliary Building 1st Floor Mezzanine	5
FP-AB-3-14f	Pre-Fire Plan Auxiliary Building DC MCC Room	6
FP-AB-4-16c	Pre-Fire Plan Auxiliary Building Ventilation Equipment Room	4

PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
20.000.18	Control of Plant from the Dedicated Shutdown Panel	52
27.000.09	Time Critical Actions Validation and Verification	4
20.000.22	Plant Fires	45
28.504.04	Fire Suppression Water System Flow Test	27
28.504.06	Fire Suppression Water System – Flush	27
MOP01	Operations Conduct Manual: Conduct of Operations	26
23.323	Communication Systems	12
27.000.09	Time Critical Actions Validation and Verification	4
37.000.014	Emergency Lighting Performance Evaluation	53B
28.506.01	Emergency Lighting 30 Day Inspections	36

WORK ORDERS

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
46341095	Perform 28.504.03 Fire Suppression Water System SIM Auto ACT Test (Diesel Pump)	08/23/2017
35724071	Perform 28.504.04 Fire Suppression Water System Functional Flow Test	08/24/2017
44228986	Perform 28.507.04 ATT 1 & 7 Test and Inspection of Fire Dampers	04/17/2017
38136650	Perform 28.507.04 ATT 1 & 6 Test and Inspection of Fire Dampers	10/30/2015
42614378	Fire Door Not Latching Properly RI-8 Water Tight Door	02/26/2015
38004423	Fire Door R3-21 (Div 2 Batt Room Door) Auto Closure Mechanism is Broken	02/10/2014
38257514	R3-21, Division 2 Battery Room Door Handle Mechanism Failing	04/25/2014
38053572	RBD18 Door Latch is Sticking	02/19/2014
44769111	Seal On Fire Door R 3-12 is Damaged.	03/29/2016