

Inspection Procedure (IP): 71111.05T, "Fire Protection (Triennial)"
Inspector Procedure Lead: Stephen Campbell
Estimated Hours to Complete Review: 8 hours
Date Review Completed: October 29, 2018

1. Results and assessment of review of IMC 0308, ROP basis document review

Verbiage in the bases section of the IP was removed and a reference to IMC 0308 was incorporated so the IP is consistent with the bases.

2. Results and assessment of review of any applicable changes to PIs

A three-year review by the PI lead did not identify any significant changes to PIs that would result in a reduction or unintended gap in the key safety attributes of each safety cornerstone.

3. Results and assessment of review of any applicable changes to Rules and STSs

Revisions to rules and Standard Technical Specifications within the last three years did not indicate a need for revision.

4. Results and assessment of review of recent Operating Experience

A review of recent Operating Experience Notes did not identify any issues warranting revisions to IP 71111.05T.

5. Results and assessment of review based on RRPS data.

Adverse trends or outliers noted: No adverse trends or outliers noted.

The actual samples and hours charged per sample are consistent with the estimated inspection hours. IP trends are stable (see explanation of trends in Section 8), and no significant findings or traditional enforcement violations have been identified in the last three to five years. No revisions to IP is recommended based on this review:

6. Feedback Forms

FBFs Closed Last three years

Denied Feedback Form 71111.05T-1803 (ML14055A204) recommended incorporating lessons learned identified during the 2011 Special Inspection Team at Monticello (significant corrosion product blockage in the intake structure fire suppression system affecting multiple safety related pumps.). The basis for denial is that it was no longer needed.

Open FBFs

Currently, there are three open Feedback Forms.

- 71111.05T-1947 which recommends renaming the term “mitigating strategies” listed in the IP.
- 71111.05T-2056 which recommends incorporating inspection guidance regarding when and how to specifically assess age-related degradation issues at plants.
- 71111.05T-2292 which recommends addressing the fire-protection related issues in OIG-17-A-10, “Audit of NRC’s Fire Protection Oversight for Operating Reactors,” April 11, 2017, (ML17101A737).

7. Other Considerations

None

8. Results of discussions with regions

The IP lead held a call with regional points of contact (POC) on October 25, 2018. The POC stated the IP contained appropriate requirements, level of detail, and appropriate inspection hour allocations. The regional feedback explained several discrepancies with the Findings trends. Several regions stated that plants transitioning to NFPA 805, the regions used the 71111.05T IP instead of the 71111.05XT IP. Also, Enforcement discretion was given for Findings and Violations for those plants. Consequently, those were not counted in the Findings trend.

Regions also mentioned that B.5.b sample should not be counted with the Fire Area sample since the B.5.b. sample takes less time to complete. When the NRC transitioned to using IP 71111.05XT, the number of IP 71111.05T inspections decreased.

Recommendations

No revisions to IP recommended.