

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

September 18, 2019

Mr. Daniel G. Stoddard Senior Vice President and Chief Nuclear Officer Dominion Energy, Inc. Innsbrook Technical Center 5000 Dominion Blvd. Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNITS 2 AND 3 – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000336/2019010 AND 05000423/2019010

Dear Mr. Stoddard:

On August 8, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Millstone Power Station, Units 2 and 3 and discussed the results of this inspection with Mike O'Connor, Assistant Plant Manager and other members of your staff. The results of this inspection are documented in the enclosed report.

Two findings of very low safety significance (Green) are documented in this report. Both of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2.a of the Enforcement Policy.

If you contest the violations or significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at Millstone.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; and the NRC Resident Inspector at Millstone.

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 Mel Gray for/

Glenn T. Dentel, Chief Engineering Branch 2 Division of Reactor Safety

Docket Nos. 05000336 and 05000423 License Nos. DPR-65 and NPF-49

Enclosure: As stated

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SUBJECT: MILLSTONE POWER STATION, UNITS 2 AND 3 – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000336/2019010 AND 05000423/2019010 DATED SEPTEMBER 18, 2019

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U.S. NUCLEAR REGULATORY COMMISSION Inspection Report

Docket Numbers:	05000336 and 05000423
License Numbers:	DPR-65 and NPF-49
Report Numbers:	05000336/2019010 and 05000423/2019010
Enterprise Identifier:	I-2019-010-0051
Licensee:	Dominion Energy Nuclear Connecticut, Inc.
Facility:	Millstone Power Station, Units 2 and 3
Location:	Waterford, CT 06385
Inspection Dates:	July 22, 2019 to August 8, 2019
Inspectors:	 M. Patel, Senior Reactor Inspector (Team Lead) C. Bickett, Senior Reactor Inspector E. Dipaolo, Senior Reactor Inspector L. Dumont, Reactor Inspector J. Fuller, Senior Resident Inspector C. Hobbs, Reactor Inspector J. Rady, Reactor Inspector
Approved By:	Glenn T. Dentel, Chief Engineering Branch 2 Division of Reactor Safety

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a triennial fire protection inspection at Millstone Power Station, Units 2 and 3 in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight for more information.

List of Findings and Violations

Failure to control transient combustible lube oil in accordance with fire protection program procedure

procedure			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000423/2019010-01 Open	[H.12] - Avoid Complacency	71111.05T

The team identified a finding of very low safety significance (Green) and an associated NCV of Millstone Unit 3 License Condition 2.H, Fire Protection, for the licensee's failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, on July 16, 2019, the inspectors identified two non-permitted, 55-gallon drums of lube oil left unattended in the Unit 3 'A' emergency diesel generator (EDG) enclosure (Fire Area EG-3A), which was contrary to Attachment 1 of procedure CM-AA-FPA-101, "Control of Combustible and Flammable Materials," and exceeded the limits provided by the fire severity calculation of record.

Inadequate Unit 2 Alternative Shutdown Procedure for Fire in East 480 Volt Load Center Room

Cornerstone	Significance	Cross-Cutting	Report
		Aspect	Section
Mitigating	Green	None (NPP)	71111.05T
Systems	NCV 05000336/2019010-02		
	Open		

The team identified a finding of very low safety significance (Green) and an associated NCV of Millstone Unit 2 Operating License Condition 2.C.(3) for failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, Dominion had not adequately implemented an alternative shutdown procedure for a fire in the Unit 2 East 480 Volt Load Center Room, as required by 10 CFR Part 50, Appendix R, Section III.L.3 and the approved Fire Protection Program.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.05T - Fire Protection

Fire Protection Inspection Requirements (IP Section 02.02) (8 Samples)

The inspectors evaluated fire protection program implementation for Millstone Unit 2 and Unit 3 in the following selected areas and fire zones:

- (1) Unit 2 R-1/A-24, Cable Vault
- (2) Unit 2 R-4/A-6, Auxiliary Building Charging Pump Cubicles
- (3) Unit 2 R-11/A-28, East 480 V Switchgear Room
- (4) Unit 2 R-17/A-10B, Auxiliary Building East Electrical Penetration Area

The inspectors analyzed the following safe shutdown circuits for Unit 2:

- 2-RC-402, Pressurizer Power Operated Relief Valve
- PT-102B, Pressurizer Pressure Wide Range Indication
- M7-8, Electric Driven Fire Pump
- 52-A401, 'B' Emergency Diesel Generator Output Circuit Breaker
- 2MS-190B, No. 2 Steam Generator Atmospheric Dump Valve
- (5) Unit 3 AB-1S, Aux Building South of Water Curtain Els. 24'-6", 43'-6" and 66'-6"
- (6) Unit 3 CB-8, Cable Spreading Area
- (7) Unit 3 ESF-9, South Motor-Driven Auxiliary Feed Pump Cubicle (B Train)
- (8) Unit 3 SB-2, North Cable Tunnel

The inspectors analyzed the following safe shutdown circuits for Unit 3:

- 3FWA*HV31A, AFW Flow Control Valve
- 3FWA*MOV35A, AFW Isolation Valve
- 3ENS*ACB-G-B, EDG B Output Breaker
- 3RHS*HCV606, RHR Hx 'A' Outlet Flow Control Valve
- 3FWS*LI529A, S/G 2 Level Indication and associated transmitter
- 3MSS*PI524B, S/G 2 Pressure Indication and associated transmitter

B.5.b Inspection Activities (IP Section 02.03) (2 Samples)

The inspectors evaluated the following B.5.b Mitigating Strategies:

- (1) Unit 2, SFP Makeup Internal
- (2) Unit 3, SFP Makeup Internal

INSPECTION RESULTS

Failure to control transient combustible lube oil in accordance with fire protection program procedure

Cornerstone	Significance	Cross-Cutting	Report
		Aspect	Section
Initiating Events	Green	[H.12] - Avoid	71111.05T
	NCV 05000423/2019010-01	Complacency	
	Open		
The team identified	 a finding of yory low apfoty significance (Croop) and an ass	opiotod NCV
of Millstone Linit 3 I	icense Condition 2 H. Fire Protection for	the licensee's fail	ure to
implement and mai	ntain in effect all provisions of the approv	ed Fire Protection	Program
Specifically on July	$\sqrt{16}$ 2019 the inspectors identified two n	on-permitted 55-a	allon drums of
lube oil left unatten	ded in the Unit 3 'A' emergency diesel ge	nerator (EDG) encl	losure (Fire
Area EG-3A), which	h was contrary to Attachment 1 of procedu	ure CM-AA-FPA-1	01, "Control of
Combustible and F	lammable Materials," and exceeded the li	mits provided by th	ie fire severity
calculation of recor	d.		•
Description: On Ju	ly 16, 2019, the inspectors identified two	55-gallon drums of	lube oil
unattended, and wi	thout a fire prevention permit (FPP), in the	e Unit 3 'A' EDG ro	om enclosure
(Fire Area EG-3A),	which was contrary to Attachment 1 of pr	ocedure CM-AA-FI	PA-101,
"Control of Combus	Stible and Flammable Materials." Attachm	ient 1, Millstone Po	ower Station
Requirements, of C	M-AA-FPA-101 states that "compustibles	and flammables n	hay be stored
only in areas appro	edures or by use of a EDD. The increate	nrough site utilizat	ion [oi] to firo marchol
had not approved t	equies of by use of a FFF. The inspecto hese transient combustibles. Upon furthe	r review the inspe	
that only 10 gallons	of transient lube oil was provided for in the	he fire severity calc	rulation
(COMBI OAD-1325	5M3 Determination of Fire Severity for Fir	e Protection Repor	t) for this fire
area. Dominion en	tered this issue in the corrective action pr	ogram as CR1126	975 and
removed the lube c	il from the fire area. Dominion reviewed	the fire severity cal	culation.
accounting for the a	additional transient lube oil, and determine	ed that the equivale	ent fire severity
did not change. Th	e inspectors also identified other areas th	roughout the plant	where
combustibles where	e left unattended without a FPP. Specific	ally, the inspectors	identified
transient combustit	oles located within 20 feet of the Unit1/Un	it 2 Control Room b	barrier, which
is designated as a	Combustible Free Zone in Procedure CM	-AA-FPA-101, "Cor	ntrol of
Combustible and F	lammable Materials." The inspectors also	o identified three ex	amples of
I metal cabinets with	combustibles stored without the door ins	talled in the Unit 3	auxiliary

transient combustibles from the fire area. Corrective Actions: Specifically, immediately following notification by the NRC of the

building. For all of the additional examples of transient combustibles left unattended, Dominion entered the issues in the corrective action program and removed the affected licensee promptly removed the lube oil from the Unit 3 'A' EDG enclosure and entered the issue in its corrective action program.

Corrective Action References: CR1126975, CR1127542, CR1127655, CR1127659 Performance Assessment:

Performance Deficiency: The inspectors determined that the licensee's failure to control transient combustible materials in Fire Area EG-3A in accordance with procedure CM-AA-FPA-101 was a performance deficiency that was reasonably within the licensee's ability to foresee and should have been prevented. Specifically, on July 16, 2019, the inspectors identified transient combustible materials left unattended in the EDG-3A room during the 24 hour EDG endurance run.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Protection Against External Factors attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. This finding is also similar to example described in IMC 0612, "Power Reactor Inspection Reports," Appendix E, "Examples of Minor Issues," Section 4k. Specifically, Dominion did not accurately account for the amount of transient combustibles present in the area and the amount of combustible loading in the fire area exceeded the maximum calculated load limit specified by the fire severity calculation of record.

Significance: The inspectors assessed the significance of the finding using Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." The inspectors assessed the significance of the finding using Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." The inspectors determined that the safety significance of the finding was very low because based on the SDP qualitative screening question related to fire prevention and administrative controls, the finding does not increase the likelihood of a fire, delay detection of a fire, or result in a more significant fire than previously analyzed such that the credited safe shutdown strategy was adversely impacted.

Cross-Cutting Aspect: H.12 - Avoid Complacency: Individuals recognize and plan for the possibility of mistakes, latent issues, and inherent risk, even while expecting successful outcomes. Individuals implement appropriate error reduction tools. Specifically, individuals involved with adding lube oil to the 3A EDG did not consider undesired consequences of their actions to leave the oil unattended at the end of their shift without an approved FPP. Enforcement:

Violation: License Condition 2.H, Fire Protection, to Facility Operating License NPF-49, requires the licensee to "implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for the facility and as approved in the SER (NUREG-1031) issued July 1985 and Supplements Nos. 2, 4, and 5 issued September 1985, November 1985, and January 1986, respectively..."

Section 3.5, Controlling the Use of Transient Combustibles, of Dominion procedure CM-AA-FPA-100, "Fire Protection/Appendix R (Fire Safe Shutdown) Program," states that transient combustibles are controlled in accordance with CM-AA-FPA-101, "Control of Combustible and Flammable Materials." Attachment 1, Millstone Power Station Requirements, of CM-AA-FPA-101 states that "combustibles and flammables may be stored only in areas approved by

the SFM [site fire marshal] either through site utilization [of] administrative procedures or by use of a FPP [fire prevention permit].

Contrary to the above, on July 16, 2019, the licensee failed to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, the licensee failed to implement procedure CM-AA-FPA-101 when two 55-gallon drums of EDG lube oil were stored in Fire Area EG-3A without the approval of the site fire marshal.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Inadequate Unit 2 Alternative Shutdown Procedure for Fire in East 480 Volt Load Center				
Room				
Cornerstone	Significance	Cross-Cutting	Report	
		Aspect	Section	
Mitigating	Green	None (NPP)	71111.05T	
Systems	NCV 05000336/2019010-02			
	Open			

The team identified a finding of very low safety significance (Green) and an associated NCV of Millstone Unit 2 Operating License Condition 2.C.(3) for failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, Dominion had not adequately implemented an alternative shutdown procedure for a fire in the Unit 2 East 480 Volt Load Center Room, as required by 10 CFR Part 50, Appendix R, Section III.L.3 and the approved Fire Protection Program.

<u>Description</u>: The team performed a review of fire safe shutdown procedures for a fire in the Unit 2 East 480 Volt Load Center Room (Fire Area R-11). Fire Area R-11 is designated as a 10 CFR Part 50, Appendix R, III.G.3 area which required alternative or dedicated shutdown capability. Panels C70A and C70B (i.e., Bottle Up Panels) are located in this fire area. These panels contain switches that remove all control power to the pressurizer power operated relief valves and steam generator (SG) isolation valves' (main steam isolation valves, blowdown valves, and the atmospheric dump valves (ADVs)) operating solenoids eliminating the possibility of spurious operation, thus ensuring that the valves remain closed. Based on review of circuit design, a fire in Fire Area R-11 could result in spurious operation of the SG isolation valves.

The team noted an inconsistency between the safe shutdown compliance strategies for a fire in Fire Area R-11 and that for Fire Area R-1 (Control Room, Cable Vault, etc.), another Appendix R, III.G.3 area, related to operator actions to mitigate spurious opening of SG isolation valves. For a fire in Fire Area R-1, steps were in place to remove control power to the SG isolation valves' circuitry by manipulating switches on Panels C70A/B early in the applicable procedure. The procedure had a time critical operator action to perform these steps within three minutes after the reactor is tripped. This was based on an initial assumption of the thermal-hydraulic analysis 255203-ER-99-0092, "Millstone Unit 2 Appendix R Cooldown Analysis Assumptions and Results," which was performed for a fire in Fire Area R-1.

The team noted that Dominion had not performed a separate thermal-hydraulic analysis for a fire in Fire Area R-11. Per Abnormal Operating Procedure (AOP) 2579D, "Fire Procedure for Hot Standby Appendix R Fire Area R-11," Revision 006-14, operators would remove power to

the SG isolation valves' circuitry in Step 11 by opening power supply breakers for the circuits in the East and West DC Switchgear Rooms. Although these steps were not designated as time critical, the Unit 2 fire safe shutdown analysis, 25203-SP-M2-SU-1046, "Millstone Unit 2 Appendix R Compliance Report," identified the time constraint for these steps as "Actions to be performed promptly upon detection of a fire or indication of spurious operation." The team also noted that AOP 2579D directed operators to trip the reactor and complete Emergency Operating Procedure 2525, "Standard Post Trip Actions," which would delay performing the actions to mitigate spurious opening of SG isolation valves. The team observed a scenario in the simulator and noted that actions to mitigate spurious opening of an ADV (i.e., Step 11) would not likely be taken prior to the SG boiling dry if an ADV opened upon initiation of the fire in Fire Area R-11.

The team questioned the adequacy of AOP 2579D to mitigate spurious opening of an ADV upon initiation of a fire in Fire Area R-11. This was because the time delay to perform these actions in the procedure would not likely meet the time constraints specified in 25203-SP-M2-SU-1046 and was longer than the time critical operator actions for similar actions for a fire in Fire Area R-1. Dominion performed a thermal-hydraulic analysis of the impact of a fire in Fire Area R-11. The analysis demonstrated that pressurizer level would not be maintained on scale and some voiding would occur in the upper reactor vessel head and upper core region for the worst case scenario (offsite power available and an ADV spuriously opens).

Corrective Actions: Dominion placed this issue into the corrective action program, established an hourly roving fire watch in Fire Area R-11, and completed an extent-of-condition review for other III.G.3 areas. Dominion documented their reasonable assurance of safety against the spurious opening of an ADV in Corrective Action 7650328. This was based upon the low likelihood of a fire that could damage the ADV circuits, low combustible loading in Fire Area R-11, the extent of condition review for other time critical operator actions in other III.G.3 areas, and other aspects of the fire protection defense in depth attributes (installed fire protection features, hourly roving fire watches, control of transient combustibles).

Corrective Action References: CR1127645, CR1128417, CR1128494. Performance Assessment:

Performance Deficiency: The failure to ensure that spurious opening of SG isolation valves (worst case was one SG ADV) was reliably mitigated in accordance with the analyzed safe shutdown methods established for Fire Area R-11 was a performance deficiency. Specifically, AOP 2579D did not take prompt and timely actions to mitigate the consequences of spurious opening of a SG ADV (worst case failure of SG isolation valves) by opening circuit control power breakers in the East and West DC Switchgear Rooms. Steps to open the circuit breakers to de-energize the SG isolation valves' circuitry (including the ADV control solenoids) were listed as Step 11 in the AOP 2579D procedure.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Protection Against External Factors attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, failure to terminate spurious opening of SG isolation valves (i.e., main steam isolation valves, SG blowdown valves, and ADVs) in a timely manner would result in loss of the SG as a heat sink path due to boiling dry and would result in significant reactor coolant system cooldown which could result in failing to meet the

performance goals of 10 CFR Part 50, Appendix R, III.L.2.b, for the reactor coolant makeup function to maintain pressurizer level within the level indication range. This finding is more than minor because it was similar to Example 3.k of IMC 0612, Appendix E, "Examples of Minor Issues," which determined that calculation errors would be more than minor if, as a result of the errors, there was reasonable doubt of the operability of a system or component.

Significance: The inspectors assessed the significance of the finding using Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." Appendix F was applicable in this case because the finding was associated with post-fire safe shutdown. This issue screened as Green in Step 1.4.7 because the finding did not adversely affect the ability to reach and maintain hot shutdown or safe and stable conditions using the credited safe shutdown success path. Dominion performed a thermal-hydraulic analysis which demonstrated that natural circulation to the core would be maintained for the worst case scenario and that pressurizer level would be restored to the indicating range as a result of reactor coolant system heat up subsequent to the SG boiling dry.

Cross-Cutting Aspect: Not Present Performance. No cross cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.

Enforcement:

Violation: Millstone Unit 2 License Condition 2.C.(3), in part, required Dominion to implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report and as approved by the NRC. Updated Final Safety Analysis Report Section 9.10.6.2, "Analysis of Safe Shutdown Systems and Components," in part, stated that unprotected electrical equipment within the affected fire area was assumed to be damaged by the fire, and an analysis was done to confirm that operators could achieve safe shutdown. 25203-SP-M2-SU-1046, "Millstone Unit 2 Appendix R Compliance Report," performed the Millstone Unit 2 fire safe shutdown analysis. Section 1.2, stated that Unit 2 complied with 10 CFR Part 50, Appendix R, Sections III.G, J, L, and O. It also stated that worst-case fire failures effects were analyzed and safe shutdown methods for each of the identified fire areas were determined. Appendix R, Section III.L.2.b required that alternate shutdown capability shall meet the performance goal for the reactor coolant makeup function of maintaining reactor coolant level within the level indication in the pressurizer. Section III.L.3, in part, stated that procedures shall be in effect to implement alternative shutdown capability.

Contrary to the above, since February 17, 1981 (the effective date of Appendix R and revised 10 CFR 50.48), Dominion had not established or implemented an adequate alternative shutdown procedure to ensure that the performance goal of III.L.2.b was met for a fire in Fire Area R-11 (i.e., East 480 Volt Load Center Room). Specifically, AOP 2579D did not contain prompt and timely actions to mitigate the consequence of spurious opening of the SG Isolation valves (worst case an ADV) during a fire in Fire Area 11 to ensure the performance goal of Appendix R, Section III.L.2.b was met.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

• On August 8, 2019, the inspectors presented the triennial fire protection inspection results to Mike O'Connor, Assistant Plant Manager and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection	Туре	Designation	Description or Title	Revision or
Procedure	••			Date
71111.05T	Calculations	COMBLOAD- 1325M3	Dominion Nuclear Power plan Unit 3 Fire Severity Calculation	1
		ERC 25203-ER- 99-0092	Millstone Unit 2 Appendix R Cooldown Analysis Assumptions and Results	2
		W2-517-744-RE	Millstone Unit 2 Appendix R Cooldown	3
	Corrective Action	CR1020297		
	Documents	CR1043455		
		CR1043458		
		CR1044326		
		CR1044332		
		CR1044334		
		CR1044348		
		CR1044536		
		CR1064321		
		CR1084786		
		CR1089915		
		CR1108379		
		CR1122631		
	Corrective Action	CR1126972		
	Documents	CR1126975		
	Resulting from Inspection	CR1127334		
		CR1127400		
		CR1127528		
		CR1127542		
		CR1127645		
		CR1127647		
		CR1127655		
		CR1127657		
		CR1127659		
		CR1127663		
		CR1127666		
		CR1127681		

Inspection	Туре	Designation	Description or Title	Revision or
Procedure				Date
		CR1127856		
		CR1128149		
		CR1128158		
		CR1128161		
		CR1128409		
		CR1128417		
		CR1128493		
		CR1128494		
		CR1128548		
		CR1128570		
	Engineering	25203-SP-M2-	MP 2 Appendix R Compliance Report	1
	Evaluations	SU-1046		
	Miscellaneous	25203-MP2-SFR	Millstone Power Station – Unit 2 Safety Functional	13
			Requirements Manual	
		25203-SP-M2-	Unit 2 Appendix R Compliance Report	1
		SU-1046		
		C MP 790	Emergency Light Inspection and Testing	03/07/19
		ETE-MP-2014-	MP3 Branch Technical Position 9.5-1 Compliance Report	4
		1213		
		SFP 21-001	Unit 2 Appendix "R" Fire Cage Inventory	08/29/18
		SFP 21-003	Honda EB2200X Generator Inspection and Operability Check	01/08/19
		SP 2657-001	Hot Shutdown Storage Box Inventory (Unit 2)	02/11/19
		SP 2657-003	Emergency Operating Equipment Inventory (Unit 2)	03/25/19
	Procedures	AOP 2559	Fire 2559	12
		AOP 2579A	Fire Procedure for Hot Standby Appendix R Fire Area R-1	12
		AOP 2579AA	Fire Procedure for Cooldown and Cold Shutdown, Appendix R	7
			Fire Area R-1	
		AOP 2579D	Fire Procedure for Hot Standby Appendix R Fire Area R-11	14
		AOP 2579DD	Fire Procedure for Cooldown and Cold Shutdown, Appendix R	7
			Fire Area R-11	
		AOP 2579Q	Fire Procedure for Hot Standby Appendix R Fire Area R-17	3
		AOP 2579T	Fire Procedure for Hot Standby Appendix R Fire Area R-4	4
		AOP 3561	Loss of Reactor Plant Component Cooling Water	19

Inspection	Туре	Designation	Description or Title	Revision or
Procedure				Date
		C MP 718F	Installation and Repair of Fire Stops and Penetration Seals	2
		C OP 200.18	Time Critical Action Validation and Verification	8
		C SP 600.18	Fire Hose Station Inspection	1
		C SP 600.22	Fire Hose Station Flow Test	1
		C SP 600.25	Fire Door Inspections	4
		C SP 600.6	Electric Fire Pump M7-8 Monthly Operability Demonstration	6
		C SP 600.7	Electric Fire Pump M7-8 Annual Operability Demonstration	5
		C SP 600.9	Diesel Fire Pump M7-7 Annual Operability Demonstration	5
		CM-AA-FPA-100	Fire Protection/Appendix R (Fire Safe Shutdown) Program	13
		CM-AA-FPA-101	Control of Combustible and Flammable Materials	11
		EOP 3509.1	Control Room, Cable Spreading Area, or Instrument Rack	20
			Room Fire	
		EOP 3509.2	Aux Building El. 24' 6", South Floor Area, 43' 6" & 66' 6" Fire	8
		EOP 3509.25	ESF Building South (B) MD AFW Pump Cubicle Fire	0
		EOP 3509.30	Service Building North Cable Tunnel Fire	2
		OP 3304A	Charging and Letdown	42
		OP-AA-102	Operability Determination	155
		SFP 17	Fire Penetration Seal and Barrier Inspections	3
		SP 2618C	Fire Protection System Smoke and Heat Detector Test	14
		SP-M2-ME-024	Upgrade of Thermo-lag fire barriers in Millstone Unit 2	0
	Work Orders	WO53103065885		
		WO53102907822		
		WO53203156833		
		WO53103003323		
		WO53203246605		