Haverkamp, Trisha

From: Dipaolo, Eugene

Sent: Monday, October 19, 2020 4:08 PM **To:** Brady, Robert R:(Exelon Nuclear)

Cc: Bickett, Carey; Dentel, Glenn; Hammann, Stephen

Subject: TMI Decommissioning Fire Protection Inspection Document Request

Attachments: TMI Decommissioning FP Document Request.docx

Robert,

Per our discussion, I am sending you a document request to support my planned decommissioning fire protection inspection at Three Mile Island. The inspection is currently planned for the week of November 9. Although emote review of the inspection is planned to be maximized, I plan to be onsite November 9-10.

Also, Carey Bickett (cc'd on this email) will be observing the inspection in a training status. Please feel free to contact us as necessary to facilitate site access.

Don't hesitate to contact me if you have any questions regarding the document request.

Gene DiPaolo Senior Reactor Engineer Engineering Branch 2 Division of Reactor Safety USNRC

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Three Mile Island Decommissioning Fire Protection Inspection Information Request

The inspection is currently planned to be performed the week of November 9, 2020 and will be conducted in accordance with the inspection guidance provided in Inspection Procedure 64704, Fire Protection Program. The inspector will also use the guidance in Regulatory Guide 1.191, Fire Protection Program for Nuclear Power Plants during Decommissioning and Permanent Shutdown, in determining the acceptability of the Three Mile Island Fire Protection Program.

Please provide access these documents to the inspector via November 2, 2020:

- 1. Copy of the Post-Shutdown Decommissioning Activities Report.
- 2. Copy of the Updated Defueled Safety Analysis Report.
- 3. Copy of the Technical Requirements Manual (only sections related to fire protection are required) and Defueled Technical Specifications.
- 4. Copy of the Defueled Fire Hazards Analysis Report.
- 5. Fire Protection Design Basis Document(s).
- 6. Fire Protection Program Implementing Procedures (e.g., Quality Assurance program for fire protection, fire protection administrative procedure, control of hot work, control of transient combustibles, control of ignition sources, storage of combustibles, permit process for combustibles and hot work, procedure to show actions taken when reducing scope of the Fire Protection Program such as licensing and fire protection impact reviews).
- 7. List of current fire protection systems and features impairments, including description.
- 8. Copy of station procedures used to respond to fire (e.g., Emergency Operating Procedures, B.5.b mitigating strategies, Abnormal Operating Procedures, Pre-Fire Plans, and Annunciator Response Procedures).
- 9. List of open and closed issue reports for fire protection system issues (e.g., fire pumps, detection, suppression, etc.) since plant shut down. Include the issue report number and a brief description (e.g. issue report title). List of open corrective work orders for active fire protection systems and a brief description. A copy of corrective action program procedures.
- 10. Last completed self-assessment on the Fire Protection Program and results. Last completed fire protection audit and/or assessment performed by Nuclear Oversight/Quality Assurance. Schedule for conducting assessments of the Fire Protection Program on a periodic basis per 10 CFR 50.48(f)(2).
- 11. List of changes to the fire protection program/systems including engineering changes/modifications/decommissions completed.
- 12. Provide supporting information related to the implementation of the incipient fire brigade:
 - a. Evaluation of the change for the onsite incipient fire brigade with primary onsite fire response by offsite firefighting organizations.

- b. Documentation associated with any review of the changes by independent offsite organization (e.g., NEIL).
- c. List of engineering changes completed to support primary response by offsite fire organizations (e.g., modifications to hose connections, staging of firefighting equipment, etc.).
- d. Training documentation (lesson plans and records of performance) associated with the onsite incipient fire brigade.
- e. Training documentation associated with offsite firefighting organizations.
- f. Procedures associated with expedited site access for offsite firefighting organizations.
- g. Evaluations, tests, or strategies related to communications with offsite responders.
- h. Copy of agreements with offsite firefighting organizations.
- i. Issue reports associated with implementing the incipient fire brigade, if applicable.
- 13. Last three completed surveillances for the site fire pumps. List of current preventive maintenance work for the fire pumps.
- 14. Last completed surveillance for the fire loop and B.5.b pump(s).
- 15. A list of fire areas that, if lost, could result in a loss of spent fuel pool cooling.
- 16. Latest Fire Protection (detection, suppression, and water supply) System Health Report, if applicable.