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

August 24, 2021

Mr. David Rhoades
Senior Vice President
President and Chief Nuclear Officer, Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: NINE MILE POINT NUCLEAR STATION – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000220/2021010 AND 05000410/2021010

Dear Mr. Rhoades:

On August 12, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Nine Mile Point Nuclear Station and discussed the results of this inspection with Mr. Adam Schuerman and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance 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 Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Glenn T. Dentel

Digitally signed by Glenn T. Dentel
Date: 2021.08.24 09:37:39 -04'00'

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

Docket Nos. 05000220 and 05000410
License Nos. DPR-63 and NPF-69

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

SUBJECT: NINE MILE POINT NUCLEAR STATION – TRIENNIAL FIRE PROTECTION INSPECTION REPORT 05000220/2021010 AND 05000410/2021010 DATED AUGUST 24, 2021

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000220 and 05000410
License Numbers:	DPR-63 and NPF-69
Report Numbers:	05000220/2021010 and 05000410/2021010
Enterprise Identifier:	I-2021-010-0016
Licensee:	Exelon Generation Company, LLC
Facility:	Nine Mile Point Nuclear Station
Location:	Oswego, NY
Inspection Dates:	July 26, 2021 to August 12, 2021
Inspectors:	C. Bickett, Senior Reactor Inspector L. Dumont, Reactor Inspector C. Hobbs, Reactor Inspector D. Kern, Senior Reactor Inspector M. Patel, Senior Reactor Inspector
Approved By:	Glenn T. Dentel, Chief Engineering Branch 2 Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a triennial fire protection inspection at Nine Mile Point Nuclear Station, 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.html for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

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. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP. However, all the inspection activities were performed onsite.

REACTOR SAFETY

71111.21N.05 - Fire Protection Team Inspection (FPTI)

Structures, Systems, and Components (SSCs) Credited for Fire Prevention, Detection, Suppression, or Post-Fire Safe Shutdown Review (IP Section 03.01) (8 Samples)

The inspectors verified that the following systems credited in the approved fire protection program could perform their licensing basis function:

(1) Unit 1 Emergency Cooling System
(2) Unit 1 Core Spray System
(3) Unit 1 Fire Protection Water Supply System
(4) Unit 1 Fire Barriers
(5) Unit 2 Safety Relief Valves
(6) Unit 2 Residual Heat Removal System
(7) Unit 2 Fire Protection Water Supply System
(8) Unit 2 Fire Barriers

Fire Protection Program Administrative Controls (IP Section 03.02) (4 Samples)

The inspectors verified that the selected administrative control or process was implemented in accordance with the current licensing basis. The inspectors ensured that the fire protection program contained adequate procedures to implement the selected administrative control and that the selected administrative control met the requirements of all committed industry standards.

(1) Unit 1 Fire Protection System Impairment Control
(2) Unit 1 National Fire Protection Association (NFPA) 805 Monitoring Program
(3) Unit 2 Fire Protection System Impairment Control
(4) Unit 2 Combustible Control Program

Fire Protection Program Changes/Modifications (IP Section 03.03) (4 Samples)

The inspectors reviewed the following changes to ensure that they did not constitute an adverse effect on the ability to safely shutdown post-fire and did not degrade assumptions and performance capability stated in the safe shutdown analysis. The inspectors verified that fire protection program documents and procedures affected by the changes were updated.

(1) Unit 1 ECP-20-000210, Upgrade Diesel Fire Pump Alternate Supply Fuse
(2) Unit 1 ECP-21-000074, Extend Surveillance Testing Interval of the Electric Fire Pump
(3) Unit 2 FPEE2-19-001, Use of Non-IEEE-383 Rated Cabling on the Refueling Floor
(4) Unit 2 FPEE2-20-001, Review of Fire Damper Testing

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On August 12, 2021, the inspectors presented the triennial fire protection inspection results to Mr. Adam Schuerman and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Calculations	S13.1-100F002	Fire Protection Water Supply	2
	Corrective Action Documents	03992068		
		04177783		
		04208724		
		04263696		
		04268283		
		04288697		
		04328835		
		04337624		
		04359366		
		04368005		
		04374440		
		04388247		
		04415668		
		04424579		
		04425591		
		04425598		
		04426317		
	Corrective Action Documents Resulting from Inspection	04434317		
		04437318		
		04437336		
		04437464		
		04437709		
		04439263		
		04440093		
		04440187		
		04440250		
		04440254		
	Engineering Changes	ECP-21-000074	Extend the Testing Frequency of the Unit 1 Electric Fire Pump, Unit 2 Electric Fire Pump, and Unit 2 Diesel Fire Pump from Monthly to Quarterly	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Engineering Evaluations	FPEE2-19-001	Use of Non IEEE-383 Rated Cabling on the Refuel Floor	0
		FPEE2-20-001	Review of Fire Damper Testing	0
	Miscellaneous	DCD-805	Nine Mile Point Unit 1 NFPA 805 Design Criteria	4
		E208	Nine Mile Point Unit 1 Nuclear Safety Capability Assessment	1
		N1-PRA-005.20	Nine Mile Point Unit 1 Probabilistic Risk Assessment Fire Protection Water Injection System Notebook	2
	Procedures	N1-FRE-F001	Fire Risk Evaluation Report	3
		N1-PM-C3	Electric and Diesel Fire Pump Performance Tests	05/05/2021
		N1-SOP-21.1	Fire in Plant	17
		N1-SOP-21.2	Control Room Evacuation	16
		N2-FSP-FPP-R001	Fire Rated Assemblies and Watertight Penetration Visual Inspection	00500
		N2-FSP-FPP-R002	Fire Damper Operation and Inspection	013T1
		N2-OP-52	Reactor Building Ventilation	22
		N2-OP-78	Remote Shutdown System	16
		N2-SOP-34	Stuck Open Safety Relief Valve	6
		N2-SOP-78	Control Room Evacuation	10
		NMP2-P306C	Cable and Mechanical Penetration Stops and Seals	5
		OP-AA-201-007	Fire Protection System Impairment Control	0
		OP-AA-201-009	Control of Transient Combustible Material	26
		OP-NM-102-106	Operator Response Time Program at Nine Mile Point	12
		OP-NM-201-105	Compensatory Measures for Inoperable Fire Protection Systems and Components	4
	Work Orders	C92692919		
		C92757601		
		C93175479		
		C93636525		
		C93672489		
		C93710683		