



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

February 24, 2022

Mr. Michael Strope
Site Vice President
NextEra Energy Point Beach, LLC
6610 Nuclear Road
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT – NOTIFICATION OF NRC FIRE PROTECTION
TEAM INSPECTION REQUEST FOR INFORMATION

Dear Mr. Strope:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region III staff will conduct a Fire Protection Team Inspection (FPTI) at your Point Beach Nuclear Plant beginning May 23, 2022. The inspection will be conducted in accordance with IP 71111.21N.05, "Fire Protection Team Inspection (FPTI)," dated June 12, 2019.

The inspection will verify that plant Systems, Structures, and Components (SSCs) and/or administrative controls credited in the approved Fire Protection Program (FPP) can perform their licensing basis function.

The schedule for the inspection is as follows:

- Preparation week (R-III office): May 16-20, 2022
- Week 1 of onsite inspection: May 23-27, 2022
- In office inspection week: May 30-June 3, 2022
- Week 2 of onsite inspection: June 6-10, 2022

Experience has shown that the baseline FPTIs are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both organizations, we have enclosed a request for documents needed for the inspection. These documents have been divided into three groups.

The first group lists information necessary to aid the inspection team in choosing specific focus areas for the inspection and to ensure that the inspection team is adequately prepared for the inspection. It is requested that this information be provided to the lead inspector via mail or electronically no later than April 15, 2022.

The second group of requested documents consists of those items that the team will review, or need access to, during the inspection. Please have this information available by the first day of the first onsite inspection week May 23, 2022.

The third group lists the information necessary to aid the inspection team in tracking issues identified as a result of the inspection. It is requested that this information be provided to the lead inspector as the information is generated during the inspection.

It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

The lead inspector for this inspection is Mr. A. Shaikh. We understand that our regulatory contact for this inspection is Ms. K. Locke of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at 630-829-9824 or via e-mail at Atif.Shaikh@nrc.gov.

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,



Signed by Shaikh, Atif
on 02/24/22

Atif Shaikh, Senior Reactor Inspector
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 05000266 and 05000301
License Nos. DPR-24 and DPR-27

Enclosure:
Information Request for Fire Protection
Team Inspection

cc: Distribution via LISTSERV®

Letter to Michael Strope from Atif Shaikh dated February 24, 2022.

SUBJECT: POINT BEACH NUCLEAR PLANT – NOTIFICATION OF NRC FIRE PROTECTION TEAM INSPECTION REQUEST FOR INFORMATION

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NOTIFICATION OF NRC TRIENNIAL FIRE PROTECTION BASELINE INSPECTION REQUEST FOR INFORMATION

I. Information Requested Prior to the Inspection Preparation Week

The following information is requested by **April 15, 2022**. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Atif Shaikh (e-mail address Atif.Shaikh@nrc.gov). Electronic media is preferred. The preferred file format is a searchable "pdf" or Microsoft Excel file on a compact disk (CD). The CD should be indexed and hyper-linked to facilitate ease of use, if possible. Please provide three copies of each CD submitted (one for each inspector).

1. Design and Licensing Basis Documents

- a. Post-fire Nuclear Safety Capability, Systems, and Separation Analysis.
- b. Fire Hazards Analysis and/or National Fire Protection Association (NFPA) 805 Design Basis Document.
- c. Fire Probabilistic Risk Assessment (PRA) Summary Document or full PRA Document (if summary document not available).
- d. NFPA 805 Transition Report, developed in accordance with NEI 04-02.
- e. Fire Risk Evaluations (i.e., NFPA 805 Section 2.4.3).
- f. Plant Change Evaluations (i.e., NFPA 805 Section 2.4.4).
- g. Analysis that demonstrates nuclear safety performance criteria can be achieved and maintained for those areas that require recovery actions.
- h. Fire Protection Program (FPP) and/or Fire Protection Plan.
- i. Copies of the current versions of the Facility Operating License and Technical Requirements Manual.
- j. List of post-fire safe shutdown components (i.e., safe shutdown equipment list).
- k. Fire protection system design basis document.
- l. List of applicable NFPA codes and standards and issuance dates (i.e., codes of record).
- m. List of deviations from (a) NFPA codes of record, or (b) NFPA 805 fundamental FPP and design elements (i.e., NFPA 805, Chapter 3).
- n. NFPA Compliance Review Report.
- o. Report or evaluation that compares the FPP to the Nuclear Regulatory Commission (NRC) Branch Technical Position (BTP) 9.5-1 Appendix A.
- p. Copy of licensee submittals and NRC safety evaluation reports that are specifically listed in the facility operating license for the approved FPP.

Enclosure

NOTIFICATION OF NRC TRIENNIAL FIRE PROTECTION BASELINE INSPECTION REQUEST FOR INFORMATION

- q. Copy of NRC Safety Evaluation Reports that form the licensing basis for the FPP and post-fire nuclear safety capability.
 - r. Copy of NRC approved exemptions for plant fire protection and post-fire nuclear safety capability features.
 - s. Copy of exemption requests submitted but not yet approved for plant fire protection and post-fire nuclear safety capability features.
 - t. List of nuclear safety capability design changes completed in the last three years (including their associated 10 CFR 50.59 and NFPA 805 plant change evaluations).
2. Operations
- a. Operating procedures to achieve and maintain nuclear safety performance criteria from the control room, with a postulated fire in the selected fire areas.
 - b. Operating procedures to achieve and maintain nuclear safety performance criteria from outside the control room, with a postulated fire in the control room, cable spreading room, or any area requiring recovery actions (other than recovery actions performed in the control room or primary control stations).
 - c. List of calculations and engineering analyses, studies, or evaluations for the nuclear safety capability methodology.
 - d. For recovery actions, provide the following:
 - i. Manual Action Feasibility Study;
 - ii. Operator Time Critical Action Program;
 - iii. Timelines for time-critical recovery actions; and
 - iv. Timeline validations.
 - e. Thermal hydraulic calculation or analysis that determines the time requirements for time-critical manual operator actions.
3. Facility Information
- One set of hard-copy documents for facility layout drawings which identify plant fire area delineation; areas protected by automatic fire suppression and detection; and locations of fire protection equipment.
4. General Plant Design Documents (available onsite for inspector review)
- a. Piping and instrumentation diagrams (P&IDs) and legend list for components used to achieve and maintain nuclear safety performance criteria for: (C-size paper drawings)
 - i. Fires outside the main control room; and
 - ii. Fires in areas requiring recovery actions at other than primary control stations.

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- b. P&IDs and legend list for fire protection systems, including fire water supply, water suppression sprinklers & deluge, and carbon dioxide (CO₂) and Halon systems (C-size paper drawings).
 - c. Yard layout drawings for underground fire protection buried piping (C-size paper drawings).
 - d. AC and DC electrical system single line diagrams, from off-site power down to the highest safety-related bus level (typically 4kV, EDG bus) (C-size paper drawings).
 - e. Single line diagrams for motor control centers (MCCs) that supply post-fire nuclear safety component loads (only for selected fire areas) (C-size paper drawings).
 - f. Equipment location drawings which identify the physical plant locations of post-fire nuclear safety capability equipment (C-size paper drawings).
 - g. Logic diagrams showing the components used to achieve and maintain hot standby and cold shutdown.
5. Administrative Control, Oversight, and Corrective Action Programs
- a. Corrective actions associated with operator actions to achieve and maintain post-fire nuclear safety performance criteria.
 - b. List of open and closed condition reports for the fire protection system for the last three years.
 - c. List of open and closed condition reports for post-fire nuclear safety capability issues for the last three years. This includes issues affecting the nuclear safety capability analysis, fire hazards analysis, NFPA 805 design basis, fire risk evaluations, plant change evaluations, post-fire operating procedures and/or training, timeline evaluations for operator actions, and supporting engineering evaluations, analysis, or calculations.
 - d. List of procedures that control the configuration of the FPP, features, and post-fire nuclear safety capability methodology and system design.
6. General Information
- a. A listing of abbreviations and /or designators for plant systems;
 - b. Organization charts of site personnel down to the level of fire protection staff personnel; and
 - c. A phone list for onsite personnel.

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II. Information Requested to Be Available on first Day of the first Onsite Inspection Week (May 23, 2022)

1. Classic Fire Protection
 - a. Copy of FPP implementing procedures (e.g., administrative controls, surveillance testing, and fire brigade).
 - b. List of calculations and engineering analyses, studies, or evaluations for the fire protection system, including the fire water system.
 - c. Hydraulic calculations or analyses for fire protection water system.
 - d. Copy of the evaluation or analysis of the effects of fire suppression activities on the ability to achieve the nuclear safety performance criteria (only for selected fire areas), including:
 - i. An automatic or manually actuated suppression system, due to a fire in a single location, will not indirectly cause damage to the success path;
 - ii. Inadvertent actuation or rupture of a suppression system will not indirectly cause damage to the success path;
 - iii. Demonstration of adequate drainage for areas protected by water suppression systems; and
 - iv. Hydrostatic rating of any floor penetration seals installed within the fire areas that are credited with keeping water from leaking into fire areas below.
 - e. Pre-fire plans for selected fire areas.
 - f. List of fire protection system design changes completed in the last three years (including their associated 10 CFR 50.59 and NFPA 805 plant change evaluations).
 - g. List of fire protection system NFPA 805 engineering equivalency evaluations completed in the last three years.
 - h. Copy of any test, surveillance, or maintenance procedure (current revision), including any associated data forms, for any requested "last performed" test, surveillance, or maintenance.
2. Electrical
 - a. Nuclear safety circuit coordination analysis for fuse and breaker coordination of nuclear safety capability components (only for selected fire areas).
 - b. Administrative or configuration control procedures that govern fuse replacement (e.g., fuse control procedures).
 - c. Maintenance procedures that verify breaker over-current trip settings to ensure coordination remains functional, for post-fire nuclear safety capability components.

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- d. Last surveillance demonstrating operability of those components operated from the primary control stations.
 - e. Schematic or elementary diagrams for circuits to be reviewed (C-size paper drawings).
 - f. Cable routing for components and equipment credited for post-fire nuclear safety capability systems and components (only for selected fire areas).
 - g. List of post-fire nuclear safety capability system and component design changes completed, in the last three years.
 - h. List of identified fire induced circuit failure analyses (only for selected fire areas).
3. Operations
- a. For safe shutdown equipment and tools, provide the following:
 - i. Procedure for inventory and inspection; and
 - ii. Most recent inspection and inventory results.
 - b. List of procedures that implement Cold Shutdown Repairs.
 - c. For Cold Shutdown Repairs, provide the following:
 - i. Procedure for inventory and inspection (i.e., needed tools, material, etc.); and
 - ii. Most recent inspection and inventory results.
 - d. List of licensed operator Job Performance Measures (JPMs) for operator actions required to achieve and maintain post-fire nuclear safety performance criteria.
 - e. List of non-licensed operator training associated with non-licensed operator actions to achieve and maintain post-fire nuclear safety performance criteria (including JPMs, in-field training walkdowns, simulations, or initial qualification).
 - f. Lesson plans for post-fire nuclear safety capability training for licensed and non-licensed operators.
 - g. For Radio communications, provide the following:
 - i. Communications Plan for firefighting and post-fire safe shutdown manual actions;
 - ii. Repeater locations;
 - iii. Cable routing for repeater power supply cables;
 - iv. Radio coverage test results; and
 - v. Radio Dead Spot locations in the plant.
 - h. Environmental and habitability evaluations for post-fire operator actions (temperature, smoke, humidity, SCBAs, etc.).

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REQUEST FOR INFORMATION**

4. Administrative Control, Oversight, and Corrective Action Programs
 - a. Self-assessments, peer assessments, and audits of fire protection activities for the last three years.
 - b. Self-assessments, peer assessments, and audits of post-fire nuclear safety capability methodology for the last three years.
 - c. List of fire event analysis reports for the last three years.
5. Any updates to information previously provided.

III. Information Requested to Be Provided Throughout the Inspection

1. Copies of any corrective action documents generated as a result of the inspection team's questions or queries during this inspection.
2. Copies of the list of questions submitted by the inspection team members and the status/resolution of the information requested (provided daily during the inspection to each inspection team member).

If you have questions regarding the information requested, please contact the lead inspector.