



U.S. NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

Region III Fire Protection Utilities Group Meeting

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June 28, 2023

Topics

- Fire Protection Staff
- Inspections
- Findings
- New Inspection Procedure

Fire Protection Staff

- RIII inspectors

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2021 Inspections

- Dresden (1 Finding)
- Perry (1 NCV)
- Byron (No Finding)
- Braidwood (URI)

2022 Inspections

- Prairie Island (1 NCV)
- Point Beach (1 NCV)
- Quad Cities (No Finding)
- Davis-Besse (URI)
- D. C. Cook (No Finding)

2023 Inspections

- Fermi (1 LIV)
- LaSalle (No Finding)
- Clinton (No Finding)
- Byron (November 27, 2023)

Recent Findings and Violations

- **(Braidwood)** A URI was opened related to Potential Protective Device Coordination Issues Associated with Battery Charger Short-Circuit Output (NRC IN 2017-06).

- **(Dresden)** The inspectors identified a finding (FIN) of very-low safety significance (Green) that was not associated with a violation for the licensee's failure to perform a quality review for level 3 Operating Experience (OPEX). Specifically, the licensee failed to perform a quality review for NRC Information Notice (IN) 2017-06, "Battery and Battery Charger Short-Circuit Current Contributions to a fault on the Direct Current (DC) Distribution System," to ensure the documentation in the OPEX evaluation was a stand-alone document and clear enough to identify that the review was completed satisfactorily.

- **(PERRY)** The inspectors identified a finding of very low safety significance (Green), and an associated non-cited violation (NCV) of Technical Specifications (TS) Section 5.4.1.a “Procedures” for the licensee’s failure to have adequate procedural guidance in their fire response procedure. Specifically, the Shutdown from Outside Control Room procedure did not prioritize isolation of the Control Room circuits for breaker EH1115 (EDG Alternate) and it did not include instructions for operating the circuit breaker without control power.
- The procedure step to verify the breaker open (Step 4.3) was before Operators placing the transfer switch to Local (Step 4.8.1)

- **(Point Beach)** The inspectors identified a finding of very low safety significance (Green) and a Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” for the licensee’s failure to evaluate the increased temperature impact of the Pressurizer Power Operated Relief Valve (PORV) tailpipe on the new cable’s routing. Specifically, to protect from failing objects, the licensee rerouted the power/control cables associated with the Unit 2 PORV and its associated block isolation valve in conduits through the same opening as the PORV tailpipe discharge line penetration. However, the licensee failed to evaluate for the increased local temperature that the cables would be subjected to when the PORV is open and the tailpipe temperature rises.

- **(Prairie Island)** A self-revealed finding of very low safety significance (Green) and associated NCV of License Condition 2.C(4), occurred when the licensee failed to implement a corrective action program that promptly identified and corrected a condition adverse to quality. Specifically, after identifying that the motor-driven fire pump (MDFP) controller enclosure was permitting water intrusion from a patch plate in place for a conduit hole that was previously cut on the top of the enclosure, which was degrading the internal 480-volt controller components, the licensee failed to correct the adverse condition and protect the controller from water intrusion.

(Fermi) A violation of T.S. 5.4.1 was identified by the licensee for the licensee failure to maintain a written procedure associated with Fire Suppression Water System Simulated Automatic Actuation test. Specifically, between from 2001 through 2021, the site failed to incorporate appropriate acceptance criteria for fire pump discharge flow and pressure in surveillance procedure for Fire Suppression Water System Simulated Automatic Actuation test. The procedure contained the acceptance criteria for the fire pumps to be 1825 gpm at 149 psig resulted in insufficient automatic flow and pressure to be delivered to the Emergency Diesel Generating (EDG) Fuel Oil Storage Tank (FOST) rooms for fire suppression.

Previously, the TRM required each pump to develop a minimum value of 2500 gpm at 150 psig at the discharge flange of the pump.

(Davis-Besse) A URI was open for Multiple NFPA 805 Non-Power Operation Transition Issues:

- The licensee's fire risk software was intended to prohibit hot work permits in fire compartments that contained pinch points during outage high risk evolutions.
- The licensee did not have procedures for implementing all the necessary NFPA 805 NPO features within their fire risk software but relied on informal notes.

New Inspection Procedure

71111.21N.05

- Remains triennial
- Two-week – no info gathering trip
- No B.5.b

New Sample Requirements

Sample Requirements		Minimum Baseline Sample Completion Requirements		Budgeted Range	
Sample Type	Section	Frequency	Sample Size (per site)*	Samples (per site)	Hours per Site every four years
Structures, Systems and Components (SSCs) Credited for Fire Prevention, Detection, Suppression, or Post-Fire SSD	03.01	Quadrennially	3**	3-4	210+/-21
Fire Protection Program (FPP) Administrative Controls	03.02		1	1-2	
FPP Changes	03.03		1	1-2	



QUESTIONS?



Thank You

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