

July 17, 2000

Mr. John K. Wood
Vice President - Nuclear
FirstEnergy Nuclear Operating Company
P. O. Box 97, A200
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT - NOTIFICATION OF AN NRC TRIENNIAL
FIRE PROTECTION BASELINE INSPECTION 50-440/00-10

Dear Mr. Wood:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region III staff will conduct a triennial fire protection baseline inspection at the Perry Nuclear Power Plant in October - November 2000. The inspection team will be lead by a senior reactor engineer from the NRC Region III Office. The team will be composed of personnel from NRC Region III and the Sandia National Laboratory. The inspection will be conducted in accordance with IP 71111.05, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit - October 11-13, 2000
- Days of onsite inspection - October 23 through November 3, 2000

The purpose of the information gathering visit is to obtain information and documentation needed to support the inspection, to become familiar with the Perry Nuclear Power Plant fire protection programs, fire protection features, and post-fire safe shutdown capabilities and plant layout; and, as necessary, obtain plant specific site access training and badging for unescorted site access. A list of the types of documents the team may be interested in reviewing, and possibly obtaining, are listed in the Enclosure to this letter.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access (including radiation protection training, security, safety and fitness for duty requirements); and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection weeks you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Perry

Nuclear Power Plant fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel, knowledgeable with respect to those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems, and the Perry Nuclear Power Plant fire protection program and its implementation, should be available at the site during the inspection.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact me at (630) 829-9751.

Sincerely,

/RA/

Ronald N. Gardner, Chief
Electrical Engineering Branch
Division of Reactor Safety

Docket No. 50-440
License No. NPF-58

Enclosure: Reactor Fire Protection Program Supporting Documentation

cc w/encl: B. Saunders, President - FENOC
G. Dunn, Manager, Regulatory Affairs
R. Schrauder, Director, Nuclear
Engineering Department
W. Kanda, General Manager
Nuclear Power Plant Department
N. Bonner, Director, Nuclear
Maintenance Department
H. Bergendahl, Director
Nuclear Services Department
State Liaison Officer, State of Ohio
R. Owen, Ohio Department of Health
C. Glazer, State of Ohio Public
Utilities Commission

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Reactor Fire Protection Program Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. The current version of the Fire Protection Program and Fire Hazards Analysis.
2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
3. Fire brigade training program and pre-fire plans.
4. Post-fire safe shutdown systems and separation analysis.
5. Post-fire alternative shutdown analysis.
6. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
7. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
9. Plant layout drawings which identify the general location of the post-fire emergency lighting units.
10. Associated circuit analysis performed to assure the shutdown functions and alternative shutdown capability are not prevented by hot shorts, shorts to ground, or open circuits (e.g., analysis of associated circuits for spurious equipment operations, common enclosure, common bus).
11. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.
12. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
13. Maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
14. A sample of significant fire protection and post-fire safe shutdown related design change packages (including their associated 10 CFR 50.59 evaluations) and Generic Letter (GL) 86-10 evaluations.
15. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.
16. Temporary modification procedures.

17. Organization charts of site personnel down to the level of fire protection staff personnel.
18. If applicable, layout/arrangement drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.
19. The SERs and actual copies of the 50.59 reviews which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.
20. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
21. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.
22. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
23. The three most recent fire protection QA audits and/or fire protection self-assessments.
24. Recent QA surveillances of fire protection activities.
25. Listing of open and closed fire protection condition reports (problem identification forms and their resolution reports).
26. Listing of plant fire protection licensing basis documents.
27. NFPA code versions committed to (NFPA codes of record).
28. Listing of plant deviations from code commitments.
29. Listing of GL 86-10 evaluations.