April 20, 2001

Mr. John Paul Cowan
Site Vice President
Palisades Nuclear Generating Plant
Consumers Energy Company
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR GENERATING PLANT - NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION BASELINE INSPECTION 50-255/01-08

Dear Mr. Cowan:

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 Palisades Nuclear Generating Plant in July 2001. The inspection will be led by a senior reactor engineer from the NRC Region III Office and will be composed of personnel from NRC Region III. 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 - June 26 - 28, 2001
- Days of onsite inspection - July 9 - 13 and July 23 - 27, 2001

The purpose of the information gathering visit is to obtain information and documentation needed to support the inspection, to become familiar with the Palisades Nuclear Generating 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, and safety); 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 Palisades Nuclear Generating 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 Palisades Nuclear Generating 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 Mr. Ronald A. Langstaff at (630) 829-9747 or myself at (630) 829-9751.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,

/RA/

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

Docket No. 50-255
License No. DPR-20

Enclosure: Reactor Fire Protection Program Supporting Documentation

cc w/encl: R. Fenech, Senior Vice President, Nuclear
Fossil and Hydro Operations
N. Haskell, Director, Licensing and Performance Assessment
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Department of Attorney General (MI)
Emergency Management Division, MI Department
of State Police

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Fossil and Hydro Operations
N. Haskell, Director, Licensing and Performance Assessment
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Department of Attorney General (MI)
Emergency Management Division, MI Department
of State Police

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Reactor Fire Protection Program Supporting Documentation

This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, to support the inspection. The lead inspector will discuss specific information needs with the licensee staff and may request additional documents.

Prior to the Information Gathering Visit

1. The reactor plant's Individual Plant Examination for External Events (IPEEE), results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.

During the Information Gathering Visit

1. The current version of the Fire Protection Program and Fire Hazards Analysis.

2. Listing of plant fire protection licensing basis documents.

3. The NRC Safety Evaluation Reports (SERs) and actual copies of the 10 CFR 50.59 reviews which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.

4. Listing of Generic Letter 86-10 evaluations.

5. National Fire Protection Association (NFPA) code versions committed to (NFPA codes of record).

6. A list of applicable codes and standards related to the design of plant fire protection features.

7. A list of plant deviations from code commitments.

8. Post-fire safe shutdown systems and separation analysis.

9. Post-fire safe shutdown analysis along with the circuit analysis methodology employed.

10. Post-fire alternative shutdown analysis.

11. 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.

12. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment for selected fire zones/areas (to be determined during information gathering visit).

13. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment for selected fire zones/areas (to be determined during information gathering visit).

14. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).

15. A listing of abbreviations/designators for plant systems.

16. Listing of open and closed fire protection condition reports (problem identification forms and their resolution reports).

17. Listing of fire impairments for previous year.

18. Pre-fire plans for selected fire zones/areas (to be determined during information gathering visit).

19. Plant operating procedures which would be used and describe shutdown for a postulated fire in selected fire zones/areas (to be determined during information gathering visit).

<u>During the Inspection</u>

1. Operator training for shutdown procedures in the event of fire.

2. List of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.

3. Coordination calculations and/or justifications that verify fuse/breaker coordination for selected fire zones/areas (to be determined during information gathering visit) that are fed off of the same electrical buses as components in the protected safe shutdown train.

4. List of significant fire protection and post-fire safe shutdown related design change package descriptions.

5. The three most recent fire protection Quality Assurance (QA) audits and/or fire protection self-assessments.