

February 20, 2002

Mr. Oliver D. Kingsley, President
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION - NOTIFICATION OF AN NRC
TRIENNIAL FIRE PROTECTION BASELINE INSPECTION 50-237/02-06;
50-249/02-06

Dear Mr. Kingsley:

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 Dresden Nuclear Power Station in April 2002. 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 - April 10 through 12, 2002
- Days of on-site inspection - April 22 through 26, 2002 and May 6 through 10, 2002

The purpose of the information gathering visit is to obtain information and documentation needed to support the inspection, to become familiar with the Dresden Nuclear Power Station 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 Dresden Nuclear Power Station 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 Dresden Nuclear Power Station 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 the lead inspector for this inspection, 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 Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure: Reactor Fire Protection Program
Supporting Documentation

See Attached Distribution

cc w/encl: W. Bohlke, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President - Mid-West Regional
J. Cotton, Senior Vice President - Operations Support
J. Benjamin, Vice President - Licensing and Regulatory Affairs
R. Hovey, Operations Vice President
J. Skolds, Chief Operating Officer
K. Ainger, Director - Licensing
R. Helfrich, Senior Counsel, Nuclear
DCD - Licensing
P. Swafford, Site Vice President
D. Bost, Station Manager
D. Ambler, Regulatory Assurance Manager
M. Aguilar, Assistant Attorney General
Illinois Department of Nuclear Safety
State Liaison Officer
Chairman, Illinois Commerce Commission

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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) for fire, results of any post-IPEEE reviews for fire, and listings of actions taken/plant modifications conducted in response to IPEEE information for fire. Alternatively, probabilistic risk analyses for fire and associated information, if more recent than the IPEEE and if it exist.
2. A list of fire areas requiring alternative shutdown capability, i.e., those areas for which 10 CFR Part 50, Appendix R, Section III.G requirements are satisfied under Section III.G.3.

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 50.59 reviews which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.
4. A list of Generic Letter 86-10 evaluations.
5. A list of applicable codes and standards related to the design of plant fire protection features. The list should include National Fire Protection Association (NFPA) code versions committed to (i.e., the NFPA codes of record).
6. A list of plant deviations from code commitments.
7. Post-fire safe shutdown systems and separation analysis
8. Post-fire safe shutdown analyses.
9. 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.
10. 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).

11. 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).
12. Listing of open and closed fire protection condition reports (problem identification forms and their resolution reports) for the past three years.
13. Listing of fire impairments for the previous year.
14. Pre-fire plans for selected fire zones/areas (to be determined during information gathering visit).
15. 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).
16. A listing of the protection methodologies identified under 10 CFR Part 50, Appendix R, Section III.G used to achieve compliance for selected fire zones/areas (to be determined during information gathering visit). That is, please specify whether 3-hour rated fire barriers (Section III.G.2.a), 20-foot separation along with detection and suppression (Section III.G.2.b), 1-hour rated fire barriers with detection and suppression (Section III.G.2.c), or alternative shutdown capability (Section III.G.3) is used for each selected fire zones/areas.
17. A listing of abbreviations/designators for plant systems.
18. Organization charts of site personnel down to the level of fire protection staff personnel.
19. A phone list for on-site licensee personnel.

During the Inspection

1. Fire brigade training program.
2. Operator training for shutdown procedures in the event of fire.
3. Plant layout drawings which identify the general location of the post-fire emergency lighting units.
4. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
5. List of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
6. 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.

7. List of maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
8. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
9. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
10. Significant fire protection and post-fire safe shutdown related design change package descriptions (including their associated 10 CFR 50.59 evaluations) and Generic Letter (GL) 86-10 evaluations.
11. Gaseous suppression system pre-operational testing, if applicable, for selected fire zones/areas (to be determined during information gathering visit).
12. Hydraulic calculations and supporting test data which demonstrate operability for water suppression systems, if applicable, for selected fire zones/areas (to be determined during information gathering visit).
9. The three most recent fire protection Quality Assurance (QA) audits and/or fire protection self-assessments.