



HDI-IPEC-22-015

February 7, 2022

Mr. James B. Cable
State Fire Administrator
New York State Department of Homeland Security and Emergency
Services 1220 Washington Avenue
Bldg. 7A, Floor 2
Albany, New York 12226

Subject: Response to DHSES Comments Regarding Indian Point Energy Center
Decommissioning Plan for Fire Protection Program

Reference:

1. Holtec Letter to NYS Division of Homeland Security and Emergency Services, "Indian Point Energy Center Decommissioning Plan for Fire Protection Program," (Letter HDI-IPEC-21-017), dated September 24, 2021
2. DHSES Letter from James B. Cable to Andrea L. Sterdis, Holtec Decommissioning International, LLC, dated 12/16/2021

Dear Mr. Cable:

On September 24, 2021, Holtec Decommissioning International, LLC (HDI) provided a copy of the "Indian Point Energy Center Decommissioning Plan for the Fire Protection Program" to NYS Division of Homeland Security and Emergency Services (DHSES) in accordance with the Joint Proposal for transferring the Indian Point Energy Center to HDI (*State of New York Public Service Commission Case 19-E-0730*).

In Reference 2, the New York State Office of Fire Prevention and Control (OFPC) requested additional information and clarification regarding the Decommissioning Plan for Fire Protection Program.

The Enclosure provides supplemental information that supports our Decommissioning Plan for the Fire Protection Program. As noted in the attachment, some of the requested documents are only available for review at the Indian Point site. Distribution of these documents is limited because they contain sensitive internal plant details that is not suitable for uncontrolled release while spent fuel is stored in the IPEC spent fuel pools. Please advise if this presents an undue hardship.

Should you have any questions, please contact Kevin Elliott, IPEC Engineering at 914-254-6725 or myself at 856-797-0900, ext. 3578.

Sincerely,

Jean Fleming
Vice President Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC



Enclosure: Supplemental information that supports the Indian Point Energy Center
Decommissioning Plan for the Fire Protection Program

cc: Regional Administrator, NRC Region I
NRC Senior Project Manager, NMSS Indian Point Units 1, 2 & 3
NRC Region I Lead Inspector, Indian Point Units 1, 2 & 3
New York State Department of Public Service
New York State Liaison Officer Designee, NYSERDA



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Enclosure to HDI-IPEC-22-015

Supplemental information that supports the Indian Point Energy Center
Decommissioning Plan for the Fire Protection Program

Responses to DHSES Comments on IPEC Decom Fire Protection Plan – per DHSES Letter dated December 16, 2021	
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NYS DHSES Comments	
1.0 “The scope of this Decommissioning Plan (DP) is to identify changes to the IPEC Fire Protection Program specifically pertaining to the (i) Fire Hazards Analyses, (ii) administrative controls (iii) physical fire protection features, (iv) and risk management subsequent to the point at which each unit has permanently ceased operations and that the fuel has been permanently removed from the respective reactor vessels.” In order to evaluate the proposed changes to the “IPEC Fire Protection Program”, the Office of Fire Prevention and Control (OFPC) requests a copy of the current, approved program in its entirety.	<p>The IPEC Fire Protection Program Plan is identified as document SEP-FPP-IP-001.</p> <p>A copy of SEP-FPP-IP-001, Rev. 8 will be available on a SharePoint site for DHSES use. In addition, the following key supporting procedures referenced within SEP-FPP-IP-001 will be available on the website:</p> <p>IP-EN-DC-161, Transient Combustible Control Program EN-DC-127, Control of Hot Work and Ignition Sources IP-SMM-TQ-122, Fire Protection Training Program EN-TQ-107, General Employee Training EN-TQ-118, Maintenance and Technical Administrative And Fundamentals Training EN-TQ-119, Maintenance Training Program EN-OP-139, Fire Watch Program</p>
2.1 OFPC requests a copy of the current Fire Hazards Analyses for IP2 and IP3. OFPC requests a copy of any revision to the Fire Hazards Analyses to assist in reviewing proposed fire protection plan changes. <ul style="list-style-type: none">• The fire hazards analysis should describe the administrative controls, physical protection features (fire detection, suppression systems, and fire barriers), smoke exhaust systems, emergency response capabilities, and any other pertinent elements of the administrative and physical fire protection program that protect against the identified fire hazards.	<p>The IPEC Fire Hazards Analyses (FHAs) were prepared in response to NRC Branch Technical Position APCSB 9.5-1, Appendix A. The FHAs address each of the topics specified in the comment.</p> <p>IP2 FHA IP2-RPT-03-00015, Rev. 8 and IP3 FHA IP3-ANAL-FP-02143, Rev. 6 are voluminous documents, encompassing some 2,700 pages and approximately 80 Mb of PDF storage. While these documents do not contain Safeguards or proprietary information, they contain potentially sensitive information relative to plant details. Hence these documents are not suitable for general release while spent fuel remains in the IPEC spent fuel pools. Hence these documents are available at the IPEC site, for use/review at the convenience of DHSES.</p>
2.2 OFPC requests a copy of the current fire loading calculations for IP2 and IP3. OFPC requests a copy of any revision to the fire loading calculations to assist in reviewing proposed fire protection plan changes.	<p>Current IP2 Combustible Loading Calculation PGI-00433, Rev. 7 and IP3 Combustible Loading Calculation IP3-CALC-FP-02795, Rev. 2, which are closely integrated with the above referenced Fire Hazards Analyses, are available for use/review at the IPEC site, at the convenience of DHSES. Note that despite removal of significant amounts of combustible materials at this stage of decommissioning (e.g., office furnishings, lubricating oil, etc.), the combustible loading calculations at present conservatively continue to reflect the presence of these legacy materials. Revision(s) to these calculations will be provided as they become available.</p>
2.3 OFPC requests a copy of the current fire brigade pre-fire plans. OFPC requests a copy of any revision to the fire brigade pre-fire plans including the plan to communicate these changes during routine training.	<p>The IPEC PRE-FIRE-PLANS, Rev. 18, is available at IPEC for use/review at the convenience of DHSES. This is a voluminous document, encompassing some 700 pages and 44 Mb of PDF storage. Revisions to the Pre-Fire Plans can be provided as they become available. Similar to the Fire Hazards Analyses, the Pre-Fire Plans do not contain Safeguards or proprietary information, but they contain potentially sensitive information relative to plant details. Hence these documents are not suitable for general release while spent fuel remains in the IPEC spent fuel pools. Hence these documents are available at the IPEC site, for use/review at the convenience of DHSES.</p>

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2.4 OFPC requests a copy of the tabulation of all areas/systems that need to be drained of combustible fluids to meet combustible loading requirements.	<p>No IPEC systems specifically require draining of combustible fluids to “meet combustible loading requirements,” as such hazards are typically equipped with fixed automatic fire suppression systems. However, as specific hazards are progressively removed/eliminated, the opportunity to retire the associated special-purpose fixed automatic suppression system(s) becomes available. These hazards are principally located in the IP2 and IP3 Turbine Buildings, and as of Q4 2021, all lubricating oil hazards, with the exception of one in each Turbine Building, have been drained/eliminated. These include the following:</p> <ul style="list-style-type: none">• Main Boiler Feed Pump oil console and reservoir• Hydrogen Seal Oil Unit• Main Turbine Lubricating oil reservoir <p>The remaining lube oil reservoirs at each unit, the Clean and Dirty Oil Storage Tanks, are pending draining/removal at this time. Pending emptying of these tanks, the dedicated fixed automatic fire suppression systems (foam deluge) for the tanks remain in service.</p>
2.5 OFPC requests a copy of the current and proposed revisions to transient combustible control zone requirements, consistent with the permanently shut down and defueled plant status.	<p>The IPEC Transient Combustible Control procedure is designated IP-EN-DC-161. A copy of the procedure has been posted to the SharePoint site referenced above.</p> <p>IPEC procedure IP-EN-DC-161 was developed from legacy Entergy procedure EN-DC-161, which addressed multiple nuclear power plants and a broad range of transient combustible control zones that are associated with operating plants. The IPEC-specific version of this procedure has simplified the transient combustible control zone identification, consistent with the permanently defueled status of IP2 and IP3. The engineering document that supports the changes in combustible control zone levels is also available on site for use/review at the convenience of DHSES.</p>
2.6 OFPC requests a finalized list of plant fire protection abandonments to support decommissioning (lineups, cross ties, eliminations).	<p>The fire protection equipment abandonments implemented as of January 2022 are quite limited, and consist of the following examples:</p> <ul style="list-style-type: none">• Retirement of special-purpose foam deluge spray systems for the main boiler feed pumps, hydrogen seal oil unit, and main turbine lube oil reservoir in both IP2 and IP3. The associated systems have been drained of all lube oil, the equipment is permanently deenergized and depressurized. Hence, the hazards that defined the need for the automatic foam spray systems have been eliminated.• Elimination of one interior fire hose station, in the IP3 Containment, to accommodate access for decommissioning process equipment. The elimination of the single hose station has been compensated by augmenting a companion hose station located in the same general area, thus maintaining adequate hose stream capability. <p>Each abandonment activity requires a formally documented fire protection impact review and justification, per procedure EN-DC-128, inclusive of identification of any documentation changes or fire brigade training changes that may be required as a result of the change.</p>
2.7 OFPC requests a copy of the plan to periodically validate continued compliance with fire protection program procedural controls, including transient combustible control, ignition source/hot work control, and operational requirements for fire protection systems and components.	<p>Validation of compliance with fire protection program requirements is performed on a 2-year frequency in the form of audits performed by the HOLTEC Quality Assurance organization, as described in the Decommissioning</p>

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	Quality Assurance Program (DQAP). Each fire protection QA audit is performed in accordance with a customized Audit Plan. A copy of the QAPM has been posted to the above referenced SharePoint site.
2.8 OFPC requests the documentation of formal fire protection engineering reviews of all fire protection program changes prior to abandonment of any fire protection systems, structures, or components, in part or in their entirety.	All fire protection program changes require prior review and approval via the fire protection impact review process, established by procedure EN-DC-128. A copy of this procedure has been posted to the above referenced SharePoint site. A copy of the completed EN-DC-128 impact review for fire protection program changes implemented as of January 2022 is available at the IPEC site for use/review at the convenience of DHSES.
4.0 OFPC requests documentation to support that all “discrete fire protection features” do not impact fire protection to other locations or systems prior to their abandonment for review and approval.	See response to Item 2.8 above.
Attachment C: OFPC requests documentation to support the abandonment of passive fire protection including diagrams of the area(s) that are being abandoned and the engineering rationale to support such abandonment.	IPEC passive fire protection features that have been abandoned as of 01/10/22 are limited to those unique features that provided protection for post-fire safe-shutdown equipment and cables. With the permanent shutdown and defueling of both IP2 and IP3, the issue of post-fire safe-shutdown no longer has validity or applicability, and therefore the specialty protection previously required for these unique features has been rendered unnecessary. In no case did these features (e.g., electrical conduit/cable wraps) contribute to overall industrial fire safety but were instead focused only on meeting certain requirements of 10 CFR 50, Appendix R, or NRC exemptions granted thereto, as they related to the ability to safely shut down an operating reactor following a postulated fire event.
OFPC requests documentation of organizations or positions responsible for the following fire protection activities: a. management of the overall fire protection program b. development, maintenance, updating, and verification of compliance of the fire protection program c. implementation of fire protection program requirements (including policies and procedures, training, fire protection system controls, system inspection, testing, maintenance and design, control of combustibles, and hot work) d. the leadership, staffing, and training of the emergency response team (e.g., fire brigade) and agreements with offsite responders (RG 1.191, Rev. 1, Page 12)	The positions within the Fire Protection organization, as well as reference to mutual aid agreements with offsite responders, are delineated in Fire Protection Program Plan SEP-FPP-IP-001.
OFPC requests documentation of the following organizational responsibilities and administrative practices: • Training necessary to ensure that the licensee’s employees, contractors, and emergency responders have the necessary knowledge and skills to properly execute their responsibilities in the fire protection program • Procedures for reporting a fire, responding to plant fire alarms, preventing fires at the plant, locating and using fire extinguishers, and of the hazards of incipient-stage firefighting • Training of fire watch personnel for buildings and hot-work operations including the use of fire extinguishers (RG 1.191, Rev. 1, Page 13)	The positions and procedures within the Fire Protection organization are delineated in Fire Protection Program Plan SEP-FPP-IP-001. Copies of the IPEC procedures referenced therein have also been posted to the SharePoint site as noted above.

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<p>OFPC requests documentation of fire brigade and offsite support:</p> <ul style="list-style-type: none">Fire brigade members and responding offsite emergency services personnel training on facility layout, fire hazards, pre-fire plans, firefighting equipment, radiation hazards, and health physics relevant to firefighting operationsPeriodic drills that have been conducted to test the readiness and capability of fire brigade personnel and offsite responders. <p>(RG 1.191, Rev. 1, Page 13)</p>	<p>The fire brigade training program is described by procedure IP-SMM-TQ-122 (copy posted to above referenced SharePoint site). Periodic drills are performed as required by the referenced procedure, and offsite responders are trained by the IPEC Fire Marshal annually to improve site familiarization. This training includes use of site foam to attack class B fires and a site walkdown. Training performed in March of 2021 covered the facility layout, fire hazards, pre-fire plans, firefighting equipment, and radiation hazards and quarterly drills are performed to maintain fire brigade proficiency. In addition, the offsite emergency services organization is invited annually to participate in a site drill.</p>
<p>OFPC requests documentation of the facility’s inventory, inspection, testing, and maintenance program for fire protection equipment. (RG 1.191, Rev. 1, Page 15)</p>	<p>All credited fire protection features and equipment is subject to periodic inspection and surveillance testing, in accordance with plant procedures. Given the vast inventory of fire protection features, equipment, and surveillance test procedures, it will be more efficient to address specific areas of interest to the reviewers.</p>
<p>OFPC requests documentation of the facility’s inspection, testing, and maintenance program for fire protection systems. (RG 1.191, Rev. 1, Page 15)</p>	<p><i>This appears to be a duplicate question.</i></p>
<p>OFPC requests documentation of the facility’s current fire detection and alarm systems and any proposed reconfiguration to ensure the fire hazards associated with decommissioning are adequately addressed. (RG 1.191, Rev. 1, Page 17)</p>	<p>The IPEC fire detection and alarm systems remain in operation, with no near-term plan to eliminate or retire systems, pending preparation of a given structure for actual demolition. The process of demolition preparation involves formal abandonment of the structure, removal of all hazards/combustibles. “gapping” of all utilities (electrical power, gas, water, etc.) such that the building is rendered “cold and dark” and secured against any unauthorized personnel access. As the decommissioning process evolves and key structures are prepared for demolition, DHSES-Office of Fire Prevention and Control will be notified by IPEC.</p>
<p>OFPC requests documentation of the facility’s fire water supply system and any proposed reconfiguration to ensure the fire hazards associated with decommissioning are adequately addressed and fire water is adequately maintained. (RG 1.191, Rev. 1, Page 18)</p>	<p>The IP2 and IP3 fire water supply systems are described in the above referenced Fire Hazards Analyses. The systems remain unchanged from their status during plant operation and are configured and operational as designed at this time. Future evolutions, which may involve reducing the number of fire pumps, cross-tying the Unit-specific systems, etc. will be formally evaluated well in advance, and DHSES will be notified in advance prior to implementation of such significant changes.</p>
<p>OFPC requests documentation of the facility’s automatic fire suppression systems and any proposed reconfiguration to ensure the fire hazards associated with decommissioning are adequately protected including any new systems that may be necessary if temporary structures are constructed that require protection. (RG 1.191, Rev. 1, Page 18)</p>	<p>The IPEC automatic fire suppression systems are described in the above referenced Fire Hazards Analyses. IPEC has procedural guidance (SEP-FPP-IP-003, IPEC Temporary Buildings and Trailers) for the provision of automatic suppression systems in temporary structures meeting specific criteria (construction, spacing from other insured structures, etc.). A copy of the subject procedure has been posted to the above referenced SharePoint site.</p>
<p>OFPC requests documentation of the facility’s manual fire suppression systems and any proposed reconfiguration to ensure the fire hazards associated with decommissioning are adequately protected including any new systems that may be necessary if temporary structures are constructed that require protection. (RG 1.191, Rev. 1, Page 18)</p>	<p>The IPEC manual fire suppression systems remain effectively unchanged at this time from their configuration during operation of the units.</p>

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OFPC requests documentation of the facility’s proposed reconfiguration of any egress and evacuation routes to ensure personnel safety during decommissioning. (RG 1.191, Rev. 1, Page 20)	At present, the personnel egress/evacuation routes in the event of a fire remain principally unchanged from those in effect during plant operation. As the decommissioning process moves forward, it may become necessary to redefine certain safe egress/evacuation paths, if demolition activities and materials may be determined to render the legacy pathways no longer viable (either permanently or temporarily).
Additional OFPC Comments	
“ ... Compliance with all relevant sections of the FCNYS and the UFPBC shall be maintained on the site while decommissioning activities are taking place. HDI shall provide detailed information regarding compliance with the FCNYS including the site-wide fire prevention program to OFPC for review. OFPC also requests a 209U report detailing all hazardous materials on site.”	<p>The IPEC site-wide fire prevention program is presented in Fire Protection Program Plan SEP-FPP-IP-001 and the family of supporting procedures listed in the response to Question (1) above. The controls on transient combustibles and hot work/ignition sources, combined with active and passive fire protection features and trained personnel, provide an appropriate level of defense in depth against the occurrence of any significant fire event during the decommissioning period. The relevant elements of Chapter 33 of the 2020 FCNYS NFPA 241 are fulfilled by the above-described Fire Protection Program Plan and the supporting fire protection program procedures.</p> <p>With regard to the reporting of hazardous materials on site, IPEC is required to submit an annual EPA Tier II (SARA 312) report in accordance with 40 CFR 370. This report provides a detailed tabulation of all hazardous materials on site, at a level of detail meeting or exceeding that suggested by the 209U form. It appears that the reporting requirements of 209U for IPEC are adequately fulfilled by the submission of the Tier II report via the E-PLAN process. Per the following website and the associated tabulation of LEPC and Fire Departments by county, the Westchester County LEPC and Fire Departments accept the submission of the hazardous materials characterization and inventory via the electronic submission of the Tier II report.</p> <p>DHSES - Tier II Reporting (ny.gov)</p> <p>HDI requests confirmation and concurrence that the hazardous materials characterization and inventory reporting requirements of 209U are in fact adequately fulfilled by the existing Tier II reporting process.</p> <p>A copy of the most recently submitted IPEC Title II report has been posted to the above referenced SharePoint site.</p>
Westchester County Comments	
The document (herein referred to as the “Plan”) focuses on the fire protection systems and protective features that will be reduced or eliminated at the site during decommissioning. There is little focus on how fire emergency response will be provided under changing circumstances during decommissioning, spent fuel storage, and spent fuel transfer to the ISFSI. WCDES recommends adding those details to the Plan.	There is no plan to change the current onsite fire-fighting capability (fire brigade, staffing, training, and equipment, until such time as site and spent fuel storage conditions can support the transition to an incipient fire brigade. As noted below, the transition to an incipient brigade will be a carefully planned and coordinated, deliberate transition, involving all stakeholders, at the earliest stage of the planning process. Revision 1 of the Plan will include discussion of this topic.

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Neither the Westchester County Department of Emergency Services (WCDES), nor Verplanck Fire Department are listed as “External Interfaces” in Section 4.0 (Pages 7-8). As the local first responders and coordinators of the Fire mutual aid response, we believe that the information Holtec proposes to share with ANI and NYSDHSES should also be shared with the local Fire Department and the County Fire Coordinator. WCDES recommends adding Verplanck Fire Department and the County Fire Coordinator to Section 4.0 for information sharing. WCDES also recommends adding more specific information about the points of contact, mechanisms and timelines for communicating this information to offsite stakeholders.	Revision 1 of the Plan will include an expanded section addressing the range of stakeholders and communication requirements as discussed. Details of points of contact in each stakeholder organization will be added as the information becomes available.
The WCDES Office of Emergency Management maintains the Fire and EMS Mutual Aid Plan for IPEC. WCDES believes that the Fire-EMS Mutual Aid Plan for IPEC will have to be modified to reflect the proposed changes to the fire protection plans for the site and proposes a meeting of all plan signatories to review and make required plan updates.	As noted above, the transition to an incipient brigade, and any necessary changes to the Fire and EMS Mutual Aid Plan, will be a carefully planned and coordinated transition, involving all stakeholders, at the earliest stage of the planning process.
Currently, the onsite Fire Brigade is a first responder to fires on the site, however, the Fire Brigade is not discussed in any detail (i.e. staffing, equipment, capability, etc.) in the proposal. If the Fire Brigade’s capabilities are not sufficient to respond to the emergency, Verplanck Fire Department would be requested to respond to the site to support the Fire Brigade. Verplanck Fire Department and its mutual aid partners play a critical role in fire protection at the site today, however this is not mentioned or discussed in the Plan.	Document SEP-FPP-IP-001 provides a description of the IPEC fire brigade and identifies mutual aid resources. Revision 1 of the Plan will include additional detail on this subject.
The Plan indicates that NYSDHSES would be notified of when the onsite Fire Brigade would be transitioned to an “Incipient Fire Brigade”, however, that is not defined in the Plan. If it is anticipated that VFD be relied upon as the primary fire response agency, Verplanck Fire Department would need to be familiar with any revised site access procedures, fire protection systems, and water supply that remain operational. WCDES recommends more clearly defining the transitioning roles of the onsite Fire Brigade and the local Fire Dept., by arranging for a stakeholder meeting to review expectations, changes in policies and procures and to assess training needs.	The transition to an “incipient fire brigade” will necessarily be a carefully planned, evaluated, and coordinated effort involving all stakeholders. Initial dialog and information exchange among all stakeholders will need to commence during 2022. Additional detail will be added to the Plan in Revision 1 to reflect this important element of the decommissioning process.
There is no mention in the Plan of the natural gas pipelines which operate in close proximity to the IPEC site. There are no provisions in the proposal for communicating with the pipeline operator, or for training and preparedness, or responding to an incident. WCDES recommends adding information about how Holtec intends to maintain regular communications with Enbridge, as well as details regarding preparedness for and responding to incidents involving the natural gas pipelines.	<p>The IPEC fire protection program appropriately concentrates its focus on protection of systems, structures, and components (SSCs) within the Protected Area, which encompasses a relatively small fraction of the overall site footprint. The Protected Area, which is not proximate to the gas pipeline right-of-way, encloses the nuclear island, the power generation equipment, and all supporting equipment and structures, inclusive of the spent fuel pools and the ISFSI dry cask storage facility.</p> <p>Relative to communication between HDI and pipeline operator Enbridge, quarterly meetings are scheduled, for routine information exchange relative to the evolving decommissioning process and plans, and any emergent questions or concerns relative to the pipelines. Additionally, at any time Enbridge staff are on the IPEC site, there is daily interaction with cognizant HDI staff.</p> <p>With regard to mitigation plans for postulated pipeline events, Enbridge has committed to include HDI when training mutual aid resources including fire departments from Montrose, Verplanck, and Buchanan.</p> <p>With respect to response to potential incidents involving the gas pipeline, the applicable operating procedure for response to fire events (3-ONOP-FP-1) includes appropriate steps for prompt and accurate diagnosis and response</p>

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	to such events. The procedural guidance includes direction for notification/mobilization of offsite/mutual aid resources, at the discretion of the Shift Manager. In accordance with the stipulations of the Joint Proposal, Enbridge emergency contact telephone numbers are located in each Control Room to ensure plant operators can promptly contact Enbridge at the outset of a potential pipeline event.
The following items were identified by local Fire officials upon review of the Plan	
Page 9, line 8, references the 2020 NYS Fire Code. However, this is seemingly contradicted when referenced on page 10 paragraph 2, which states "Fire protection systems associated with these SSCs may be isolated and abandoned....."	<p>The retirement of discrete fire protection features (e.g., limited-coverage fixed automatic foam deluge systems) is warranted only when the hazard has been removed from the area (oil reservoirs, equipment, and piping have been drained of all lubricating oil, and the equipment has been permanently deenergized). At this point, the fire hazard that was present during plant operation (and for a short period following entry into the decommissioning phase) has been nullified. There is no longer a fuel source or ignition source to warrant the presence of an automatic fire suppression system, and the system can therefore be secured from operation without adversely impacting site fire safety defense in depth.</p> <p>The described process of retiring special-purpose suppression systems when the associated hazard(s) are removed is not in conflict with the guidance of the NYSFC.</p>
The 2020 NYS Fire Code Section 901.4.5 Appearance of Equipment should be referred to. In particular, it states: Any device that has the physical appearance of life safety or fire protection equipment, but that does not perform that life safety or fire protection shall be prohibited.	Acknowledged. This Code guidance will have applicability later in the decommissioning process, when (for example) hose stations/standpipes are rendered inoperable in preparation for demolition of a structure, or in preparation for implementation of the transition to an incipient fire brigade. Additional text will be provided in Revision 1 of the Plan to reference this expectation/requirement.
NFPA 101 2018 4.6.12.3 States: Existing life safety features obvious to the public, if not required by code shall be maintained.	Acknowledged. This Life Safety Code guidance has applicability as structures are progressively abandoned and readied for demolition. An appropriate reference will be added in Revision 1 of the Plan.
The NRC Inspection Manual page 6 refers to the testing and inspection of the fire equipment. Who will be responsible for notifying the Verplanck Fire District of these changes to the equipment when they are removed?	When a given fire protection subsystem/feature is retired from service (as a result of elimination of the associated hazard, and/or in preparation for demolition of a given structure), inspection and testing of the affected feature(s) will of course be suspended. The identified stakeholders will be notified of the retirement of the fire protection feature(s) by IPEC fire protection management. Additional explanatory text on this subject will be added in Revision 1 to the Plan.

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Additional comments for NYS Department of Public Service	
The State notes that is imperative that Indian Point’s decommissioning not interfere with the safe operation of three interstate natural gas transmission pipelines that traverse and run adjacent to the Indian Point site, and, vice versa, that the pipelines do not interfere with the safe decommissioning of Indian Point. While HDI does not operate the pipelines, which are owned and operated by Enbridge, Inc., the fact that these infrastructure are co-located at the site warrants a specific, detailed written plan be incorporated into the Indian Point Fire Protection Program. Further, HDI should provide detailed information, including information pertaining to risk assessment and mitigation plans for natural gas pipeline infrastructure incidents on site.	<p>All decommissioning activities involving the demolition of major IPEC plant structures will be performed north of the location of all three gas pipelines. Any work that must be performed in proximity to the pipelines, including the transport of heavy loads originating from demolition activities, will be discussed with Enbridge prior to implementation. This requirement will be reflected in Revision 1 to the Plan. In addition, Holtec will take the location of the pipelines into account during decommissioning activities as per the joint proposal in place between NYS agencies and Holtec.</p> <p>With regard to gas pipeline risk assessment, Enbridge performs the required pipeline integrity verification and testing on a periodic basis, to ensure that the pipeline operability and integrity remain within the prescribed safety parameters. Additional detailed risk assessment results are provided in the April 20, 2020 NRC Expert Evaluation Team report pertaining to the gas pipelines (NRC ADAMS Accession Number ML20100F635). This report also documented the licensing and analysis history relative to the legacy pipelines (30” and 26”), which consistently concluded that the legacy pipelines do not present a substantial threat to safety-related SSCs at any of the IPEC units.</p> <p>With regard to mitigation plans for postulated pipeline events, Enbridge has committed to include HDI when training mutual aid resources including fire departments from Montrose, Verplanck, and Buchanan, for response to a potential pipeline event. As noted above, IPEC “Plant Fires” procedure 3-ONOP-FP-1 incorporates diagnostic, decision-making, and communications guidance, to direct the contacting and deployment of mutual aid resources, as determined to be required by plant operators, at the outset of a potential gas pipeline event.</p> <p>The IPEC fire protection program appropriately concentrates its focus on protection of systems, structures, and components (SSCs) within the Protected Area, which encompasses a relatively small fraction of the overall site footprint. The Protected Area encloses the nuclear island, the power generation equipment, and all supporting equipment and structures, inclusive of the spent fuel pools and the ISFSI dry cask storage facility.</p> <p>All previous engineering analyses and regulatory evaluations of postulated gas pipeline events were determined to present an insignificant challenge to any SSCs (inclusive of spent fuel assemblies, whether in the spent fuel pools or dry storage casks within the ISFSI) within the Protected Area, and hence no explicit fire protection response or mitigating actions within the Protected Area were determined to be necessary, beyond those described in Plant Fires response procedure 3-ONOP-FP-1. As such, no additional modifications to the fire protection program to accommodate postulated gas pipeline events appear to be warranted.</p>