



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

December 19, 2022

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President & Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 – TRIENNIAL
FIRE PROTECTION INSPECTION REPORT 05000317/2022010 AND
05000318/2022010

Dear David Rhoades:

On December 14, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Calvert Cliffs Nuclear Power Plant, Units 1 and 2. The results were discussed with Patrick D. Navin, Site Vice President, and other members of your staff and are documented in the enclosed report.

Two findings of very low safety significance (Green) are documented in this report. Two of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at Calvert Cliffs Nuclear Power Plant.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; and the NRC Resident Inspector at Calvert Cliffs Nuclear Power Plant.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Glenn T. Dentel, Chief
Engineering Branch 2
Division of Operating Reactor Safety

Docket Nos. 05000317 and 05000318
License Nos. DPR-53 and DPR-69

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT – TRIENNIAL FIRE
PROTECTION INSPECTION REPORT 05000317/2022010 AND
05000318/2022010 DATED DECEMBER 19, 2022

DISTRIBUTION:

GDentel, DORS
DWorkheiser, DORS
BBickett, DORS
PFinney, DORS
KMooney, DORS
EDiPaolo, DORS, SRI
SObadina, DORS, RI
CFragman, DORS, AA
MFerdas, RI OEDO
RidsNrrPMCalvertCliffs Resource
RidsNrrDorlLpl1 Resource

DOCUMENT NAME: <https://usnrc.sharepoint.com/teams/EngineeringBranch2/Shared Documents/Fire Protection/Triennial Fire Protection Inspections/Calvert Cliffs 2022/CC Triennial Protection IR 2022010.docx>

ADAMS ACCESSION NUMBER: ML22353A560

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DORS	RI/DORS	RI/DORS	RI/DORS	
NAME	DWorkheiser	BPinson	BBickett	GDentel	
DATE	12/15/2022	12/19/2022	12/15/2022	12/19/2022	

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers: 05000317 and 05000318

License Numbers: DPR-53 and DPR-69

Report Numbers: 05000317/2022010 and 05000318/2022010

Enterprise Identifier: I-2022-010-0031

Licensee: Constellation Energy Generation, LLC

Facility: Calvert Cliffs Nuclear Power Plant

Location: Lusby, MD

Inspection Dates: October 17, 2022 to December 14, 2022

Inspectors: L. Cline, Senior Reactor Inspector
L. Dumont, Senior Reactor Inspector
D. Kern, Senior Reactor Inspector
B. Pinson, Reactor Inspector

Approved By: Glenn T. Dentel, Chief
Engineering Branch 2
Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a triennial fire protection inspection at Calvert Cliffs Nuclear Power Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

Failure to Perform Periodic Functional Testing on the Unit 2 Remote Shutdown Panel			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000317,05000318/2022010-01 Open/Closed	[H.5] - Work Management	71111.21N.05
The inspection team identified a Green finding and associated non-cited violation (NCV) of the Calvert Cliffs Unit 2 Facility Operating License Condition 2.E of Unit 2, for failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, Constellation did not perform periodic functional testing on the Unit 2 remote shutdown panel 2C43 as required in section 4.13.3 of CC-AA-211, "Fire Protection Program," Revision 9.			

Failure to Evaluate Changes to the Halon Suppression System Tank Weight Verification Surveillance Procedure			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000317,05000318/2022010-02 Open/Closed	[P.1] - Identification	71111.21N.05
The inspectors identified a Green finding and associated non-cited violation (NCV) of Calvert Cliffs Operating License Condition 2.E, because the licensee implemented a procedure change that used an alternative method for determining the weight of Halon bottles, but did not perform an engineering evaluation using a relevant technical requirement or standard to confirm that the procedure change did not adversely affect the functionality of the halon system.			

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.21N.05 - Fire Protection Team Inspection

Structures, Systems, and Components Credited for Fire Prevention, Detection, Suppression, or Post-Fire Safe Shutdown Review (IP Section 03.01) (3 Samples)

The inspectors verified that components and/or systems will function as required to support the credited functions stated for each sample. Additional inspection considerations are located in the fire hazards analysis (FHA) or safe shutdown analysis (SSA).

- (1) Unit 1 Chemical Volume and Control System
- (2) Unit 2 Auxiliary Feedwater System
- (3) Halon Suppression System

Fire Protection Program Administrative Controls (IP Section 03.02) (2 Samples)

The inspectors verified that the selected control or process is implemented in accordance with the licensee's current licensing basis. If applicable, ensure that the licensee's Fire Protection Program contains adequate procedures to implement the selected administrative control. Verify that the selected administrative control meets the requirements of all committed industry standards.

- (1) Fire Brigade, Drills, and Qualification
- (2) National Fire Protection Association (NFPA) 805 Monitoring Program

Fire Protection Program Changes/Modifications (IP Section 03.03) (2 Samples)

The inspectors verified the following:

- a. Changes to the approved Fire Protection Program did not constitute an adverse effect on the ability to safely shutdown.
- b. The adequacy of the design modification, if applicable.
- c. Assumptions and performance capability stated in the SSA had not been degraded through changes or modifications.
- d. The fire protection program documents, such as the updated final safety analysis report (UFSAR), fire protection report, FHA, and SSA were updated consistent with the fire protection program or design change.
- e. Post-fire safe shutdown operating procedures, such as abnormal operating procedures, affected by the modification were updated.

- (1) ECP 17-000029; Electrical Distribution Reliability Improvement Project
- (2) ECP 17-000461 and ECP 20-000576; Steam Generator Feed Pump 13 Unit 1

INSPECTION RESULTS

Failure to Perform Periodic Functional Testing on the Unit 2 Remote Shutdown Panel			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000317,05000318/2022010-01 Open/Closed	[H.5] - Work Management	71111.21N.05
<p>The inspection team identified a Green finding and associated non-cited violation (NCV) of the Calvert Cliffs Unit 2 Facility Operating License Condition 2.E of Unit 2, for failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, Constellation did not perform periodic functional testing on the Unit 2 remote shutdown panel 2C43 as required in section 4.13.3 of CC-AA-211, "Fire Protection Program," Revision 9.</p> <p>Description: The Unit 2 remote shutdown panel is used to manipulate and control components required for safe shutdown following some fire scenarios, such as control room abandonment. The functionality of the individual components is checked through periodic testing done as a part of performance evaluation PE 2-102-10-P-R, Remote Shutdown Panel Operation Verification, Revision 00700. Historically, this testing has been performed during refueling outages, and was most recently performed in 2019. The performance evaluation was intended to be performed during the 2021 refueling outage, but only portions of the test were completed. CC-AA-211, "Fire Protection Program," Revision 9, section 4.13.3 states in part, "Equipment and components required to perform various manual actions for fire safe shutdown are checked periodically to verify they are available to meet the manual action steps." Constellation generated PE 2-102-10-P-R to satisfy the requirements of CC-AA-211 as it pertains to Unit 2 remote shutdown panel 2C43.</p> <p>Inspectors determined that Constellation did not perform the required testing associated with performance evaluation PE 2-102-10-P-R on the Unit 2 remote shutdown panel 2C43 in 2021 due to it being descoped from the work schedule prior to the start of the refueling outage. The performance evaluation did not have a specific work process code indicating that it had NFPA 805 regulatory impact and was descoped from the 2021 outage work schedule. The code indicating that the performance evaluation was an NFPA 805 commitment would raise the associated work order prioritization and ensure the testing was performed to meet the requirements of CA-AA-211. As a result of the performance evaluation being descoped, only portions of the functional testing were performed as part of post-maintenance activities on individual components.</p> <p>On October 27, 2022, Constellation performed a risk evaluation to assess the change in risk associated with the missed performance evaluation, and determined that it was acceptable to schedule the next performance of PE 2-102-10-P-R during the 2023 refueling outage.</p> <p>Corrective Actions: Constellation documented the performance deficiency in their corrective action program. Constellation's proposed actions included performing an evaluation for the missed performance evaluation to evaluate its impact to the fire protection program and to perform the missed performance evaluation during the 2023 refueling outage or the next forced outage.</p>			

Corrective Action References: IR 04532098

Performance Assessment:

Performance Deficiency: The inspection team determined that the failure to perform periodic functional testing on the Unit 2 remote shutdown panel was a performance deficiency. Specifically, Constellation did not perform periodic functional testing on the Unit 2 remote shutdown panel 2C43 as required by their fire protection procedure, CC-AA-211, "Fire Protection Program," Revision 9, to ensure that manual actions required for fire safe shutdown were available in the event of a significant fire.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Protection Against External Factors attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, Constellation did not prioritize and perform the Unit 2 remote shutdown panel's performance evaluation during the 2021 refueling outage and due to the coding error was not assured that the testing would be completed in subsequent outages.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." Inspectors assessed the significance of the finding using Inspection Manual Chapter 0609, Appendix F, "Fire Protection SDP." This issue screened to very low safety significance (Green) in Phase 1, step 1.4.7, Post-fire Safe Shutdown, because it did not adversely affect the ability to reach and maintain safe and stable conditions. Additionally, the assessment also took into consideration a risk evaluation completed by Constellation that demonstrated that the change in risk is acceptably low to allow the next performance evaluation to be performed during the 2023 refueling outage.

Cross-Cutting Aspect: H.5 - Work Management: The organization implements a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. The work process includes the identification and management of risk commensurate to the work and the need for coordination with different groups or job activities. Specifically, during the work planning process Constellation failed to include a special code indicating that the performance evaluation was related to National Fire Protection Association commitments. Consequently, the work order to perform the Unit 2 remote shutdown panel functional testing was not prioritized for work during the 2021 refueling outage.

Enforcement:

Violation: Calvert Cliffs Unit 2 Facility Operating License Condition 2.E requires Calvert Cliffs, in part, to implement and maintain in effect all provisions of the approved Fire Protection Program. CC-AA-211, "Fire Protection Program," Revision 9, section 4.13.3 stated, in part, "Equipment and components required to perform various manual actions for fire safe shutdown are checked periodically to verify they are available to meet the manual action steps." Constellation generated PE 2-102-10-P-R to satisfy the requirements of CC-AA-211 as it pertains to Unit 2 remote shutdown panel 2C43.

Contrary to the above, from March 20, 2021, the completion of the 2021 Unit 2 refueling outage, and ongoing at the time of the exit meeting, Constellation failed to perform periodic functional testing of the Unit 2 remote shutdown panel as required by CC-AA-211.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Evaluate Changes to the Halon Suppression System Tank Weight Verification Surveillance Procedure			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000317,05000318/2022010-02 Open/Closed	[P.1] - Identification	71111.21N.05
<p>The inspectors identified a Green finding and associated non-cited violation (NCV) of Calvert Cliffs Operating License Condition 2.E, because the licensee implemented a procedure change that used an alternative method for determining the weight of Halon bottles, but did not perform an engineering evaluation using a relevant technical requirement or standard to confirm that the procedure change did not adversely affect the functionality of the halon system.</p> <p><u>Description:</u> NFPA 805 Chapter 3.2.3(1) requires that procedures be established to accomplish inspection, testing and maintenance for fire protection systems and features credited by the fire protection program.</p> <p>Calvert Cliffs UFSAR Section 9.9.3, Fire Protection Program and Design Elements, states that fire protection equipment and systems are inspected and tested following the guidance of applicable NFPA Codes and Standards. Testing requirements for fire protection systems that protect equipment needed to achieve and maintain a safe and stable condition are contained in the Technical Requirements Manual (TRM) and plant procedures mandate the testing process.</p> <p>TRM limiting condition for operation 15.7.7, Halon System, states that equipment in the Unit 1 and Unit 2 cable spreading rooms, the Unit 1 and 2 27-foot and 45-foot switchgear rooms, the Unit 1 and 2 DAS computer rooms, and cable chase 1C and 2C is relied upon to achieve and maintain safe and stable conditions and is protected by Halon.</p> <p>NFPA 12A, Halogenated Extinguishing Agent Systems Halon 1301, 1971, is the code of record for the Halon systems installed at Calvert Cliffs. Section 1715 directs that the weight and pressure of refillable containers shall be checked semiannually and if a container shows a loss in net weight of more than 5 percent, it shall be refilled or replaced. The standard also states that the goal of inspection and testing shall not only ensure the system is in a full operating condition, but shall also indicate the probable continuance of that condition until the next inspection. TRM technical verification requirement (TVR) 15.7.7.2 requires that halon storage tank weight (level) is verified >95 percent of full charge every six months. The weight associated with a full charge for the halon bottles is indicated on the nameplate for each bottle and most bottles are charged greater than the full charge amount when received from the vendor.</p> <p>Calvert Cliffs Nuclear Power Plant Surveillance Test Procedure STP-F-492-0, Halon System Storage Tank Weight, and Pressure Verification performed the weight verification required by TRM TVR 15.7.7.2. STP-F-490-0, Revision 8, verified halon bottle weight by weighing the halon bottles using a 0 to 1000 lbs. or 0 to 2000 lbs. scale. On May 22, 2019, the licensee implemented revision 9 to this procedure. This revision added an alternative method for determining the weight of halon in the bottles. It used an ultrasonic instrument (Coltraco Ultrasonics, Porta level Max) to measure level and then calculated bottle weight by applying conversion factors for temperature and tank volume from the halon system vendor manual to the measured level. In this revision the ultrasonic level measurement was used to determine weights for the bottles that supply halon to the Unit 1 and Unit 2 cable spreading rooms, the Unit 1 and 2 27-foot and 45-foot switchgear rooms, and cable chase 1C and 2C.</p>			

The inspectors determined that the halon system vendor manual included a method for determining bottle weight by measuring level and that guidance in Electric Power Research Institute (EPRI) 1006756 for fire protection equipment surveillance optimization and maintenance also acknowledged that measuring level can be an alternative to weighing the halon bottles. The method described in the licensee's new procedure did not include the same steps as the method used in the vendor manual and EPRI 1006756 did not provide details on how to perform the alternate level method. However, both the vendor manual and EPRI 1006756 emphasized the importance of correlating the measured level to a past known value obtained by weighing the container and this was a step that the inspectors identified as missing from the licensee's new procedure revision.

The inspectors questioned whether the licensee's revised procedure and weighing the bottles on a scale were functionally equivalent because the licensee's revised procedure did not directly align with the vendor manual and EPRI guidance. Additionally, the inspectors reviewed the halon bottle weights recorded during the last three performances of STP-F-490-0, Revision 9, and identified significant variability considering an acceptance criterion of less than 5 percent reduction from full charge. For example, the inspectors identified that in six of the eighteen bottles supplying halon to the Unit 1 and 2 45-foot and 27-foot switchgear rooms the calculated weight of halon based on measured level increased on average by more than 5 percent without being recharged between the first and last measurement of the last three performances of STP-F-490-0.

The Calvert Cliffs NFPA 805 license condition allows changes to approved fire protection program elements without NRC prior approval when an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent to the previously approved methods for the corresponding technical requirement. Procedure CC-AA-211, Fire Protection Program, step 4.15.3 states that changes to fire protection program implementing procedures are reviewed to assure that fire protection capability is maintained at acceptable levels and that a change does not adversely impact post-fire safe shutdown capability.

LS-AA-128-101, Regulatory Review of Proposed Changes to the Approved NFPA 805 Fire Protection Program, is used when a 50.59 applicability review for a proposed procedure change concludes that a fire protection regulatory review is required. The LS-AA-104-1002, 50.59 Applicability Review Form, for STP-F-490-0, revision 9, identified that the proposed procedure change involved a change to the Fire Protection Program and directed the use of LS-AA-128-101, Attachment 1, Fire Protection Change Regulatory Review. Contrary to the requirements of the Fire Protection Program, the licensee did not complete this review prior to implementing the change to procedure STP-F-490-0 and therefore did not demonstrate that the proposed alternative method for determining the weight of halon bottles was functionally equivalent to previously approved methods.

On November 22, 2022, in response to inspector concerns, the licensee measured the weight using a scale and ultrasonic level measurement in eight spare halon bottles. The difference between these two measurements for four of the eight bottles was greater than 5 percent, and the difference was greater than 13 percent on two of the bottles. The variation in measured weight using the ultrasonic level measurement was also not always in the conservative direction. For one of these four bottles, the ultrasonic level weight measurement was greater than the weight measured by the scale, and for the other three bottles, the ultrasonic level weight measurement was less than the weight measured using the scale.

Given that the design requirements for the halon system require that a bottle showing a loss in net weight of more than 5 percent of full charge be replaced, the inspectors determined that variation seen in the halon weight determined using the new procedure revision was potentially significant. Without an appropriate engineering evaluation to confirm that the licensee's revised procedure for determining halon weights was functionally equivalent to previously approved methods, the licensee could not ensure that the revised procedure would accurately identify bottles containing less than 95 percent of full charge. Leaving bottles with less than the required charge installed in the halon system could adversely impact the halon system's functionality. The halon system is used to protect equipment relied upon to achieve and maintain safe and stable conditions from fire damage.

Corrective Actions: To confirm current halon system functionality based on the concerns raised by the inspectors, the licensee weighed over 50 percent of the halon bottles using a scale and each of the bottles weighed exceeded the TVR acceptance criteria of 95 percent of full charge. The licensee initiated corrective actions to weigh all remaining bottles using a scale, and to address the surveillance test procedure concerns and associated performance deficiencies.

Corrective Action References: IRs 4535176, 4537628 and 4539974

Performance Assessment:

Performance Deficiency: Exelon Procedure LS-AA-128-101, step 4.5.2.4 requires that proposed changes to previously approved fire protection program elements related to NFPA 805, Chapter 3, which are not trivial, must be reviewed by the fire protection engineer, via an engineering evaluation, to confirm the procedure change meets the code of record and is functionally equivalent. Prior to implementing the change to STP-F-492-0, the licensee did not complete an engineering evaluation and did not demonstrate that the proposed alternative method for determining the weight of halon bottles was functionally equivalent to previously approved methods.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Procedure Quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. A comparison of bottle weights determined using a scale and bottle weights determined using an ultrasonic instrument identified that the difference between these two measurements could be greater than 13 percent in either the positive or negative direction. Therefore, not evaluating the accuracy of the licensee's procedure for calculating halon weight by measuring level could have prevented the licensee from identifying halon bottles that needed replacement.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." The inspectors determined this finding to be under the "Fixed Fire Protection Systems" category, in accordance with Table 1.2.1, "Finding Categories" of IMC 0609, Appendix F. A low degradation rating was assigned to this finding because the halon systems in the Unit 1 and Unit 2, cable spreading rooms, the Unit 1 and 2 27-foot and 45-foot switchgear rooms, and cable chase 1C and 2C were determined to be functional after the licensee weighed 50 percent of the bottles using a scale and determined that none were less than the TVR acceptance criteria. Therefore, the inspectors determined the finding is of very low safety significance (Green).

Cross-Cutting Aspect: P.1 - Identification: The organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely,

accurately, and in a timely manner in accordance with the program. When the weight of halon bottles was determined by measuring level for the first time in June of 2019 and the new level method resulted in a more than 5 percent decrease in the weight of half of the halon bottles supplying the Unit 1 27-foot and 45-foot switchgear rooms, the licensee did not identify a potential concern, take action to evaluate the significant decrease in weight or confirm the accuracy of the new procedure revision.

Enforcement:

Violation: Calvert Cliffs Operating License Condition 2.E requires that changes to the approved fire protection program that are associated with an NFPA 805, Chapter 3, fundamental fire protection program element, may be made without prior NRC approval when an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent to the corresponding technical requirement.

Contrary to the above, on May 22, 2019, and ongoing at the time of the exit meeting, the licensee implemented a change to the Calvert Cliffs approved fire protection program that was associated with an NFPA 805 Chapter 3, fundamental fire protection program element (inspection, testing, and maintenance for fire protection systems and features credited by the fire protection program – halon suppression system), without prior NRC approval, but did not complete an engineering evaluation that demonstrated the Chapter 3 element was functionally equivalent.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On December 14, 2022, the inspectors presented the triennial fire protection inspection results to Patrick D. Navin, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Calculations	CA05974	10CFR50 Appendix R Fire Protection AOP-9 Simulations	Revision 0
	Corrective Action Documents	04376839		
	Corrective Action Documents Resulting from Inspection	04530940		
		04530983		
		04530996		
		04532098		
		04532556		
		04532561		
		04532647		
		04533658		
		04534059		
		04534208		
		04534296		
		04534346		
		04534644		
		04534752		
		04535176		
		04535906		
		04537628		
		04539974		
	Engineering Changes	ECP 17-000335	Calvert Cliffs Electrical Distribution Reliability Improvement Project (EDRIP)	Revision 2
		ECP 17-000461	Unit 1 Standby Feedwater Pump Installation	Revision 3
		EDP 20-000576	Steam Generator Overfill Event Timeline	Revision 0
	Engineering Evaluations	R2215-049-001	NFPAP 805 Recovery Action Feasibility Assessment	Revision 2
	Miscellaneous	A-SURV-02	Risk Analysis of Missed Remote Shutdown Panel Performance Evaluation	10/27/2022
	Procedures	AOP-9A-2	Control Room Evacuation and Safe Shutdown due to a Severe Control Room Fire	Revision 21

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		AOP-9B-2	Safe Shutdown due to a Severe Cable Spreading Room Fire	Revision 22
		CC-AA-211	Fire Protection Program	Revision 9
		OP-AA-102-106	Operator Response Time Program	Revision 8
		OP-CA-102-106	Operator Response Time Program at Calvert Cliffs	Revision 11
	Work Orders	C93612030		