



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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July 1, 2009

J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - NOTIFICATION OF NRC TRIENNIAL
FIRE PROTECTION BASELINE INSPECTION (05000397/2009006)

Dear Mr. Parrish:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region IV staff will conduct a triennial fire protection baseline inspection at the Columbia Generating Station in September and October of 2009. The inspection team will be comprised of four reactor inspectors from the NRC Region IV office and a Reliability and Risk Engineer from the Office of Nuclear Regulatory Research (RES) accompanying the team for training purposes. The inspection will be conducted in accordance with Inspection Procedure 71111.05T, "Fire Protection (Triennial)," the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit: September 1 - 4, 2009
- Onsite inspection: September 21 - 25, 2009
October 5 - 9, 2009

Members of the inspection team will visit the Columbia Generating Station on September 1 - 4, 2009, to meet with selected members of your staff in order to gather information and documentation needed to support the inspection, to obtain unescorted access to the facility, to discuss office space assigned to the team, to become familiar with your fire protection program, and to select the fire areas of interest for the inspection.

Experience has shown that this inspection is resource intensive both for the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. Please note that some of the documents are requested to be provided prior to the information gathering visit.

We request that during the onsite inspection weeks, you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents that establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel knowledgeable of: (1) those

plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, (2) the electrical aspects of the post-fire safe shutdown analyses, (3) reactor plant fire protection systems, (4) the fire protection program and its implementation and (5) the operational implementation of fire response procedures should be available to support the team at the site during the inspection.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Fred Schill of your licensing organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, Sam Graves, at 817-860-8102 or by email, samuel.graves@nrc.gov.

In accordance with 10 CFR 2.390 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/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Neil F. O'Keefe, Chief
Engineering Branch 2
Division of Reactor Safety

Docket: 50-397
License: DPR-21

Enclosure: Triennial Fire Protection
Inspection Documentation Requested

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ENCLOSURE

Triennial Fire Protection Inspection Documentation Requested

Please provide the following documentation prior to the onsite information gathering trip, preferably no later than August 24, 2009. Where practical, please provide copies electronically.

1. The current version of your Fire Protection program and Fire Hazards Analysis.
2. Post-fire safe shutdown analysis, post-fire alternative shutdown analysis, and any supporting calculations which demonstrate acceptable plant response.
3. Copies of the licensing basis documents for fire protection (Safety Evaluation Reports, pertinent sections of the Final Safety Analysis Report, exemptions, deviations, letters to/from the NRC regarding fire protection/fire safe shutdown, etc.).

Please provide the following documentation during the onsite information gathering trip September 1 - 4, 2009. Where practical, please provide copies electronically. However, drawings should be provided as paper copies of sufficient size that all details are legible. Fire protection program implementing procedures (e.g., administrative controls, surveillance testing).

4. Operating procedures used for achieving and maintaining hot and cold shutdown conditions from the control room in the event of a fire outside the control room (III.G.2 areas).
5. Operating procedure(s) used to implement alternative shutdown (III.G.3 areas) capability with or without control room evacuation.
6. Pre-fire plans for the selected fire areas (areas to be selected by the team during the information-gathering trip).
7. A list of equipment used to achieve and maintain hot standby and cold shutdown in the event of a fire (safe shutdown equipment list), and two copies of the piping and instrumentation (flow) diagrams for these systems of a size sufficient to read all details. These should include the systems used for RCS makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems.
8. Plant layout and equipment drawings for the selected fire areas that identify (a) the physical plant locations of major hot standby and cold shutdown equipment; (b) plant fire area and/or fire zone delineation; and (c) the locations of fire protection equipment, such as detection, suppression, and post-fire emergency lighting units, and (d) fire area boundaries.
9. Electrical schematics and cable raceway listings for circuits supplying power to 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. A listing of design change packages, which were determined to impact fire protection and post-fire safe shutdown, performed in the last 3 years.

11. A listing of Generic Letter 86-10 evaluations performed in the last 3 years.
12. A listing of fire protection corrective action documents initiated in the last 3 years which relate to the fire protection program or equipment.
13. A listing of the applicable codes and standards (e.g. NFPA) related to the design of plant fire protection features and evaluations of any code deviations showing the version committed
14. Drawings of the emergency lighting system which support fire response.
15. Procedures used to remove smoke from safety-related areas and the engineering studies or calculations which support the design basis.
16. Drawings of communication systems credited in the license basis for firefighting and plant operations during fires where control room is occupied and/or evacuated.
17. Piping and instrumentation (flow) diagrams for the fire water and sprinkler systems.
18. Maintenance Rule performance criteria and 3 years worth of performance history for fire protection program systems or functions monitored within the Maintenance Rule program.
19. A copy of fire protection program requirements (e.g. limiting conditions for operation, surveillance test requirements) covered by Technical Specifications, Technical Requirements Manual, UFSAR, or similar documents.
20. Copies of internal and external self-assessments, audits, peer-assessments or similar reviews related to post-fire safe shutdown capability or the fire protection program completed within the last 3 years.
21. A list of manual actions taken outside the control room which are credited to mitigate the consequences of fires in III.G.2 areas (non-alternative shutdown areas). The list should group actions by the initiating fire area or zone and indicate where the action must take place.
22. Electronic copies of operator study guides (lesson plan text and graphics) or design basis documents that describe the purpose/function/operating characteristics of the safe shutdown systems (RCS makeup, RCS pressure control, decay heat removal, and reactivity control, including the essential support systems).
23. Two copies of one-line diagrams of the electrical distribution system. These should depict how power gets from the switchyard to ESF loads. Also include the vital DC distribution system one-line diagrams.

24. A copy of any analysis used to determine in which fire areas a fire could cause a loss of offsite power (or conversely, a fire could never cause a loss of offsite power). If there is no analysis, please provide a list of fire areas where offsite power cables are routed, or where key breakers, protective relaying, or transformers are located. We are interested in the equipment that delivers/controls offsite power from the switchyard to the ESF buses.
25. Please provide a list of automatic and manually initiated gaseous fire suppression systems in the plant, giving location and the key equipment being protected.
26. Please provide a list of repairs (and the procedure that controls the actions) needed to:
a) reach and/or maintain hot shutdown; b) reach and/or maintain cold shutdown.
27. A list of high to low pressure interface valves.
28. A copy of procedures governing the training and operation of the fire brigade.
29. Copies of maintenance procedures which routinely verify fuse/breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
30. The team would like to observe a fire brigade drill in the plant, if possible. Please put us in contact with the appropriate personnel to plan a drill during the onsite information gathering trip September 1 - 4, 2009.
31. Organization charts of site personnel down to the level of fire protection staff personnel.
32. A contact list of key site personnel who will be supporting this inspection, giving location of their office and phone number onsite.

Inspector Contact Information:

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