



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064**

March 13, 2000

Gregg R. Overbeck, Senior Vice
President, Nuclear
Arizona Public Service Company
P.O. Box 52034
Phoenix, Arizona 85072-2034

**SUBJECT: NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION BASELINE
INSPECTION 50-528/00-05; 50-529/00-05; 50-530/00-05**

Dear Mr. Overbeck:

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 Palo Verde Nuclear Generating Station, Units 1, 2, and 3, in June 2000. The inspection team will be comprised of four reactor inspectors from the NRC Region IV Office and two contracted personnel from the Sandia National Laboratory. The inspection will be conducted in accordance with Inspection Procedure 71111.05, "Fire Protection," the NRC's baseline fire protection inspection procedure.

To aid in our preparation for this inspection, we request that your plant's post-fire safe shutdown analysis and plant layout drawings (identifying the physical plant locations of hot standby and cold shutdown equipment) be provided to the lead inspector, Raymond P. Mullikin, for examination in our regional office. This information should arrive in the NRC's Region IV Office in Arlington, Texas, no later than May 8, 2000.

The schedule for the inspection is as follows:

- Information gathering visit - May 30 through June 1, 2000
- Week of onsite inspection - June 12-16, 2000

In advance of the onsite week of inspection, members of the inspection team will visit the Palo Verde Nuclear Generating Station facility on May 30 through June 1, 2000, to obtain information and documentation needed to support the inspection, to become familiar with the fire protection programs, fire protection features, post-fire safe shutdown capabilities and plant layout and, as necessary, obtain plant-specific site access training and badging for unescorted site access. A nonexhaustive list of the types of documents the team will be interested in reviewing, and possibly obtaining, are listed in the Enclosure.

During the information gathering visit, the team will conclude discussions on 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 site access (including radiation protection training, security, safety, and fitness-for-duty requirements); and the availability of knowledgeable plant engineering and licensing organizational personnel to serve as points of contact during the inspection.

We request that, during the onsite inspection week, 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, and (4) the 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 me at 817/860-8195 or Ray Mullikin at 817/860-8102.

Sincerely,

Original signed by

Dr. Dale A. Powers, Chief
Engineering and Maintenance Branch
Division of Reactor Safety

Enclosure: As stated

Docket Nos.: 50-528; 50-529; 50-530
License Nos.: NPF-41; NPF-51; NPF-74

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ENCLOSURE

Reactor Fire Protection Program Supporting Documentation

1. The current version of the fire protection program and fire hazards analysis.
2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).
3. Fire brigade training program and pre-fire plans.
4. Post-fire alternative shutdown analysis.
5. Piping and instrumentation (flow) diagrams highlighting 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.
6. Plant layout and equipment drawings that identify the physical plant locations of hot standby and cold shutdown equipment.
7. Plant layout drawings that identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
8. Plant layout drawings that identify the general location of the post-fire emergency lighting units.
9. Associated circuit analysis performed to assure the shutdown functions and alternative shutdown capabilities are not prevented by hot shorts, shorts to ground, or open circuits (e.g., analysis of associated circuits for spurious equipment operations, common enclosure, common bus).
10. Plant operating procedures that would be used and which describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, and procedures that would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.
11. Maintenance and surveillance testing procedures for fire barriers, detectors, pumps, and suppression systems.
12. Maintenance procedures that routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
13. A sample of significant fire protection and post-fire safe shutdown related design change packages (including their associated 10 CFR 50.59 evaluations) and Generic Letter 86-10 evaluations.

14. The plant's individual plant examination external event report, results of any post-individual plant examination external event reviews, and listings of actions taken or plant modifications conducted in response to individual plant examination external event information.
15. Temporary modification procedures.
16. Organization charts of site personnel down to the level of fire protection staff personnel.
17. If applicable, layout/arrangement drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.
18. The 10 CFR 50.59 reviews, which form the licensing basis for the plant's post-fire safe shutdown configuration.
19. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
20. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.
21. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
22. The three most recent fire protection quality assurance audits and/or fire protection self-assessments.
23. Recent quality assurance surveillances of fire protection activities.
24. Listing of open and closed fire protection condition reports (problem reports, nonconformance reports, problem identification and resolution reports).
25. Listing of plant fire protection licensing basis documents.
26. National Fire Protection Association code versions committed to (codes of record).
27. Listing of plant deviations from code commitments.
28. Listing of Generic Letter 86-10 evaluations.