

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

January 10, 2012

Mr. Adam C. Heflin, Senior Vice
President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT - NOTIFICATION OF NRC TRIENNIAL FIRE PROTECTION
BASELINE INSPECTION (05000483/2012007)

Dear Mr. Heflin:

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 Callaway Plant in April, 2012. The inspection team will be comprised of four reactor inspectors from the NRC Region IV office. The inspection will be conducted in accordance with Inspection Procedure 71111.05T, "Fire Protection (Triennial)," dated October 28, 2011, which is the NRC's current baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit: March 26 – 28, 2012
- Onsite inspection: April 16 – 20, 2012
April 30 – May 4, 2012

Members of the inspection team will visit the Callaway Plant on March 26 – 28, 2012, 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

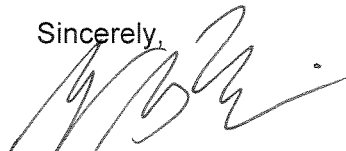
team for their review. Of specific interest are those documents that establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel knowledgeable of: (1) those plant systems required to 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 Mr. S. Petzel of your Regulatory Affairs organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, Sam Graves, at 817-200-1102 or by email, samuel.graves@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011.

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,



Geoffrey Miller, Chief
Engineering Branch 2
Division of Reactor Safety

Docket: 50-483
License: NPF-30

Enclosure: Triennial Fire Protection
Inspection Documentation Request

Electronic distribution to site

ENCLOSURE

Triennial Fire Protection Inspection Documentation Request

Please provide the following documentation (items 1 – 5) prior to the onsite information gathering visit, preferably no later than March 12, 2012. Where practical, please provide copies electronically. Please provide titles/descriptions in the electronic file name or, as a minimum, an index categorized similar to this numbered listing with the appropriate title/description.

1. The current version of your fire protection program and fire hazards analysis.
2. Post-fire safe shutdown analysis and the supporting calculations that 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.).
4. The fire probabilistic risk assessment or portions of the plant's individual plant examination for external events report addressing fire events. Also, include the results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to probabilistic risk assessment updates. Please include any updated risk assessments resulting from your transition to 10 CFR 50.48(c), "National Fire Protection Association Standard NFPA 805."
5. A copy of the documents that support your multiple spurious operation evaluations (i.e., expert panel reports, evaluation packages, etc.).

Please provide the following documentation (items 6-48) during the information-gathering visit in order to support inspection preparation. Whenever practical, please provide copies electronically. Drawings should be provided as paper copies of sufficient size such that all details are legible.

6. Plant layout and equipment drawings for 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. The specific documents needed to support inspection preparation will be discussed during the site visit.
7. Fire protection program implementing procedures (e.g., administrative controls, operator response procedures for fires, fire fighting procedures, etc.).
8. 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).

9. Operating procedure(s) used to implement an alternative shutdown (III.G.3 areas) capability with or without control room evacuation.
10. A list of equipment used to achieve and maintain hot standby and cold shutdown in the event of a fire (safe shutdown equipment lists).
11. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for normal and alternate shutdown. Please provide one copy 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 reactor coolant system makeup, reactor coolant system pressure control, decay heat removal, and reactivity control, including the essential support systems.
12. A listing, with descriptions, of design change packages which were determined to impact fire protection and post-fire safe shutdowns, performed since the last triennial fire protection inspection (since April 9, 2009).
13. Copies of fire protection program change evaluations (Generic Letter 86-10 evaluations) performed since the last triennial fire protection inspection.
14. Procedures/instructions that control the configuration of the plant's fire protection program, features, and post-fire safe shutdown methodology and system design. Also, procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.
15. A listing of open and closed corrective action documents initiated since the last triennial fire protection inspection which relate to the fire protection program or equipment, including corrective actions for fire-induced circuit failures, both single and multiple spurious actuations (for the selected fire areas). Include corrective action program document number, date, and subject.
16. A listing of the applicable codes and standards (with the versions/dates) related to the design of plant fire protection features and evaluations of any code deviations. Copies of these codes should be available for review.
17. Drawings of the portions of the emergency lighting system which support fire response.
18. Procedures used to remove smoke from safety-related areas and the engineering studies or calculations which support the design basis.
19. Drawings of communication systems credited in the license basis for firefighting and plant operations during fires where control room is occupied and/or evacuated.
20. Piping and instrumentation (flow) diagrams for the fire water and sprinkler systems.
21. A listing of maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems. Also, include a list of maintenance and surveillance testing procedures which verify fuse and breaker coordination in accordance with the post-fire safe shutdown coordination analysis.

22. Maintenance rule performance criterion and a summary of the performance history for systems or functions monitored within the maintenance rule program that support the fire protection program or involve safe shutdown equipment, over the period since the last triennial fire protection inspection (since April 9, 2009).
23. A copy of fire protection program requirements (e.g., limiting conditions for operation, surveillance test requirements) covered by technical specifications, technical requirements manual, updated final safety analysis report, or similar documents.
24. 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 since the last triennial fire protection inspection.
25. 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.
26. Electronic copies of operator study guides (i.e., 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).
27. Two copies of one-line diagrams of the AC and DC electrical distribution systems. These should depict how power gets from the switchyard to the engineered safety feature loads.
28. A list of automatic and manually initiated gaseous fire suppression systems in the plant, giving location and the key equipment being protected.
29. A list of repairs (and the procedure that controls the actions) needed to: (a) reach and/or maintain hot shutdown, and (b) reach and/or maintain cold shutdown.
30. A list of high to low pressure interface valves.
31. A copy of procedures governing the training and operation of the fire brigade.
32. Organization charts of site personnel down to the level of fire protection staff personnel.
33. A contact list of key site personnel who will be supporting this inspection, giving location of their office and phone number onsite.
34. The team would like to observe an unannounced fire brigade drill in the plant, if possible, during the week of April 30, 2012. Please put us in contact, during the onsite information gathering trip, with the appropriate personnel for planning drills.
35. The team would like to perform a walkthrough of the procedure for control room evacuation due to fire with qualified operators in the plant during the week of April 16,

2012. Please put us in contact, during the onsite information gathering trip, with the appropriate personnel for planning the walkthrough.

The following documents (items 36 – 48) involve B.5.b mitigating strategies.

36. A copy of the license condition that addresses the requirements of Section B.5.b of the ICM Order, EA-02-026, dated February 25, 2002, and 10 CFR 50.54(hh)(2).
37. A list of all modifications to regulatory commitments made to meet the requirements of Section B.5.b of the ICM Order, EA-02-026, dated February 25, 2002, the subsequently imposed license conditions, and 10 CFR 50.54(hh)(2).
38. A list of procedures/guidelines which were revised or generated to implement the mitigation strategies. These could be extensive damage mitigation guidelines (EDMGs), severe accident management guidelines (SAMGs), emergency operating procedures (EOPs), abnormal operating procedures (AOPs), etc.
39. A matrix that shows the correlation between the mitigation strategies identified in Nuclear Energy Institute 06-12 and the site-specific procedures or guidelines that are used to implement each strategy.
40. A list of engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies.
41. Copies of piping and instrumentation diagrams (P&ID) or simplified flow diagrams for systems relied upon in the mitigation strategies. These could be the type used for training.
42. A list of modification packages and simplified drawings/descriptions of modifications that were made to plant systems to implement the mitigation strategies.
43. Copies of procedure(s) used to inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies.
44. A list of B.5.b strategies, if any, which have implementing details that differ from that documented in the submittals to the NRC and the safety evaluation report.
45. A copy of site general arrangement drawing(s) that show the majority of buildings/areas referenced in B.5.b documents.
46. Training records/ training matrix/ lesson plans related to B.5.b.
47. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies.
48. The team would like to perform a walkthrough of the procedure implementing a sample mitigating strategy (to be selected by the inspector during the information gathering visit) and the inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies during the week of April 16, 2012. Please put us in

contact with the appropriate personnel for planning the walkthrough during the onsite information gathering trip

The following documentation needs (items 49 – 51) will be dependent upon sample selections, and will be finalized during discussions with your staff. Please provide the required documents prior to the week of April 16, 2012. Whenever practical, please provide copies electronically. Drawings should be provided as paper copies of sufficient size such that all details are legible.

49. Pre-fire plans for the selected fire areas (areas to be selected by the team during the information-gathering trip).
50. List of identified fire induced circuit failure configurations (for the selected fire areas) that could prevent operation or cause maloperation of equipment credited for safe shutdown in the event of a fire. Include failure configurations associated with hot shorts, open circuits, or shorts to ground identified as potentially causing spurious or multiple spurious actuations or maloperations of this equipment.
51. Cable routing information for components and equipment, credited for safe shutdown in the selected fire areas. This information request item will be discussed and finalized with your staff during the information gathering visit.