

FIRE PROTECTION PROGRAM AT PERMANENTLY SHUTDOWN REACTORS

Effective Date: 01/01/2021

PROGRAM APPLICABILITY: IMC 2561 Appendix A

64704-01 INSPECTION OBJECTIVES

01.01 To assess whether the licensee has an effective decommissioning fire protection program that is maintained and implemented to address the potential for fires that could result in the release or spread of radioactive materials. [Title 10 of the *Code of Federal Regulations* (10 CFR) 50.48(f)]

01.02 To verify the decommissioning fire protection program protects the integrity of the spent fuel and prevents or minimizes the release of radioactive materials resulting from fires involving contaminated plant structures, systems, and components (SSCs) or radioactive waste products.

01.03 To verify in the absence of spent fuel in the spent fuel storage pool, the decommissioning fire protection program ensures adequate protection from the fire-induced release of radioactive material from contaminated plant areas and combustible waste products.

64704-02 INSPECTION REQUIREMENTS

02.01 Fire Protection Program

- a. Select (2 – 4) fire areas and verify that NRC requirements are being met, including the requirements detailed in plant defueled technical specifications (PDTs), post-shutdown decommissioning activities report (PSDAR), defueled fire hazard analysis, fire brigade staffing, pre-fire plans, and procedures for firefighting. This should include a walkdown of the fire areas to verify fire hazards have been identified, physical plant configuration, and physical fire protection features.
- b. Review changes to the fire protection program (e.g., changes to the fire brigade, decommissioning of fire protection systems, etc.) to assure the changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard, taking into account the plant conditions and activities during decommissioning in accordance with 10 CFR 50.48(f)(3).
- c. Review the licensee's assessment performed in accordance with 10 CFR 50.48(f)(2).

02.02 Fire Protection Systems and Equipment

- a. Select (1 – 3) installed fire protection detection and suppression systems and verify the systems are effectively maintained, surveillances performed, and are capable of performing their intended function. Verify the credited offsite responder equipment (e.g., fire hose connections, water supply pressure, etc.) are compatible with plant equipment.
- b. Select (1 – 3) fire barrier components and verify they are effectively maintained, surveillances performed, and capable of performing their intended function.
- c. Select (1 – 3) storage areas and verify whether fire brigade personnel protective equipment and manual firefighting equipment are properly inventoried, inspected, tested, and maintained to ensure proper performance/operation in the event of a fire.

02.03 Control of Combustible Materials and Ignition Sources. Select (2 – 4) fire areas and verify that administrative controls are in place for the use and storage of combustible materials in a manner that minimizes the occurrence of fire. Verify that hot work activities (welding, cutting, grinding, brazing, or similar flame or spark-producing operations) are controlled by licensee procedures and requirements for a fire watch have been established and implemented.

02.04 Organization. Verify the staffing requirements and training of the site fire brigade personnel and local offsite fire departments responders, as required, are consistent with the Fire Protection Program and Emergency Preparedness requirements.

02.05 Problem Identification and Resolution. Verify that the licensee is identifying problems related to the fire protection program at an appropriate threshold and entering them into the corrective action program. If applicable, for a sample of problems documented in the corrective action program, verify that the licensee has identified and implemented appropriate corrective actions.

64704-03 INSPECTION GUIDANCE

General Guidance

Typically, there are two types of fire protection licensing bases; Prescriptive/Deterministic and Risk-informed Performance-based, both of which are covered by this Inspection Procedure (IP). Prescriptive/Deterministic fire protection applies to plants licensed under 10 CFR 50.48(a) and 10 CFR 50.48(b). Risk-informed Performance-based fire protection applies to plants that have transitioned to the National Fire Protection Association (NFPA) Standard 805 “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants,” 2001 Edition via 10 CFR 50.48(c). The inspector should review the plant fire hazard analysis to determine if the plant is prescriptive/deterministic or risk-informed performance-based.

The primary objective of this IP is to verify that each licensee maintains a decommissioning fire protection program to address the potential for fires that could result in the release or spread of radioactive materials. The primary fire protection concern for permanently shutdown plants is protecting the integrity of the spent fuel and preventing or minimizing the release of radioactive materials resulting from fires involving contaminated plant SSCs or radioactive waste.

Regulatory Guide 1.191, Revision 1, “Fire Protection Program for Nuclear Power Plants During Decommissioning,” provides methods that are acceptable to the NRC staff for complying with the NRC’s regulations for fire protection programs for licensees that have certified that their plants have permanently ceased operations and that the fuel has been removed from the reactor vessels. The inspector should use this guidance when reviewing a licensee’s fire protection program.

For a licensee with an approved NFPA 805 fire protection program in accordance with 10 CFR 50.48(c) for use during plant operation may transition its program to meet 10 CFR 50.48(f) requirements by demonstrating compliance with NFPA 805, Chapter 5. For a plant that has implemented NFPA 805 fire protection program the inspector should refer to Section C.6, of Regulatory Guide 1.191, Revision 1, for additional guidance when inspecting certain aspects of the plants fire protection program.

If possible, the inspector should obtain and review the licensee’s pre-fire plans, defueled fire hazard analysis, and associated procedures prior to arrival onsite. The inspector should also review previous NRC inspection reports in the area of fire protection to ascertain the scope of previous reviews and documented licensee performance. See Attachment 1 for a list of documents the inspector should request from the licensee prior to performing this inspection.

The inspector is not required to compete all of the inspection requirements listed in the IP, nor is the inspector limited to those inspection requirements listed if any additional safety concerns are identified. However, the objectives of the IP should be met. Due to variance in decommissioning strategies and timelines, subsequent inspections may be less comprehensive, based on the plant conditions and configurations. Decommissioning activities may increase fire hazards in the plant through mechanisms that include, but are not limited to, increased hot work, increased combustible loading, erection of temporary structures to support decommissioning or dismantlement of the plant, and deactivation or abandonment of plant systems. In addition to the physical changes to the plant, the licensee’s organizational structure and responsibilities are expected to be different during decommissioning, with staffing levels significantly lower than during plant operation. Inspectors should select inspection items using a risk-informed, performance-based approach, while also considering variety. Inspectors should review a sampling of past inspection reports to inform their selection.

When a site is in SAFSTOR (i.e., long-term safe storage), the inspector should focus on changes to the fire protection program, compliance with their existing program, including any coordination with local offsite responders, and observations during walkdowns of the plant to include combustible materials and ignition sources and the physical condition of fire detection and fire suppression systems. Programmatic aspects of this procedure (Sections 2.02 and 2.04) do not need to be reviewed annually, instead the inspector should consider programmatic reviews every 3 years or when the site transitions to a new decommissioning strategy as defined in IMC 2561, “Decommissioning Power Reactor Inspector Program” (i.e., transitioning from SAFSTOR to DECON).

Specific Guidance

03.01 Fire Protection Program

- a. The defueled fire hazards analysis provides a comprehensive evaluation of the facility’s fire hazards, the fire protection capability relative to the identified hazards, and the ability to protect spent fuel and other radioactive materials from potential fire-induced

releases. The defueled fire hazards analysis should be reevaluated and revised by the licensee as necessary to reflect the unique or different fire protection issues and strategies associated with decommissioning. The fire hazards are typically identified by fire area. The inspector should use the fire hazard analysis and pre-fire plans, when completing walkdowns of the plant and verify the physical plant layout, configuration, and condition of the fire areas are as described in the fire hazard analysis.

The inspector should verify the licensee has provided procedures to formally establish the organizational responsibilities and administrative practices of the fire protection program. Emergency procedures should be provided to describe emergency response actions, including the operational actions necessary to mitigate the consequences of fires. Pre-fire plans should identify the firefighting strategy to be used according to the fire location and the hazards involved. Coordination with local offsite responders and the fire response leadership and command structure for both the onsite fire brigade and local offsite responders should be explained in the licensee procedures.

- b. The licensee may make changes to the fire protection program without prior NRC approval provided the changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard, taking into account the decommissioning plant conditions and activities. The inspector should review the changes to the fire protection program to verify the changes do not reduce the effectiveness of the fire protection program. For NFPA 805 plants, a licensee can change the fire protection program without prior NRC approval if an engineering evaluation demonstrates that the alternative is either functionally equivalent to the NFPA 805 Chapter 5 requirements. [10 CFR 50.48(f)(3)]
- c. The operating plant fire protection program provides the baseline analysis and description of plant fire hazards, administrative controls, physical protection features, and emergency response capabilities. Many of these elements are carried over to the fire protection program for a decommissioning reactor. The fire protection program is expected to change throughout the various phases of decommissioning. Initially, with spent fuel removed from the reactor vessel and stored in the spent fuel storage pool, it is appropriate to develop and maintain a comprehensive decommissioning fire protection program to ensure that the probability of fires affecting the spent fuel or other radiological hazards is minimized and that the consequences of fires, should they occur, are adequately mitigated. As decommissioning progresses and the spent fuel is moved to an Independent Spent Fuel Storage Installation or permanent repository, the fire protection requirements for the plant will be scaled down in accordance with the diminishing radiological hazard. However, even in the absence of spent fuel in the spent fuel storage pool, a fire protection program that ensures adequate protection from the fire-induced release of radioactive material from contaminated plant areas and combustible waste products should be maintained. The inspector should verify the licensee's fire protection program is reevaluated at least annually and revised as necessary to reflect the facility condition through the various stages of decommissioning. [10 CFR 50.48(f)(2)]

Additional Guidance for changes to the fire protection program for a plant with an approved NFPA 805 fire protection program, can be found in Regulatory Guide 1.191, Revision 1, Section C.6.

03.02 Fire Protection Systems and Equipment

The purpose of this inspection requirement is to verify a program for inspection, testing, and maintenance is provided to verify the operability of installed fire protection systems and features. Fire protection features include passive fire protection systems such as fire barrier components and fire barrier penetration seals. Active fire protection systems include fire alarm systems (detection), fire suppression systems (automatic and manual), and fire water supply systems. The licensee's program for inspection, testing, and maintenance should be based on vendor recommendations, as well as on criteria specified in industry codes and standards such as those published by the NFPA. The licensee should have written procedures for inspection, testing, and maintenance of fire protection systems and equipment. Licensee personnel performing inspection, testing, and maintenance of installed fire protection systems and features should be trained and qualified for the type of system to which they are assigned.

a. Fire Detection Systems

During decommissioning, the fire hazards and the associated fire detection and alarm requirements will change significantly. The change in priorities from protecting safety-related equipment required for safe shutdown to protecting against the release or spread of radioactive material may require reevaluation of the fire detection and alarm system design to ensure that the fire hazards of decommissioning are adequately addressed.

Fire alarm and supervisory signals should be annunciated in a constantly attended location. The fire alarm system should provide a signaling system for notifying plant personnel. Fire alarm systems should meet the following criteria:

- The operation of an automatic fire suppression system initiates a fire alarm.
- Automatic fire detection systems using smoke, heat, or flame detectors, as appropriate, are maintained for early detection of fires.
- The alarm system maintains supervision of automatic fire suppression system control functions, as appropriate.

The inspector should verify the fire alarm systems are effectively maintained, surveillances are performed, and capable of performing its intended function.

Fire Suppression Systems

Automatic fire suppression systems that exist when a plant enters the decommissioning phase should be kept operable based on the fire hazards analysis; these systems should be able to protect plant egress routes for evacuation of plant personnel in a fire. Automatic fire suppression systems should be provided where flammable or combustible materials are used or stored. Construction of new or temporary structures to support decommissioning may require the installation of automatic fire suppression systems based on the fire and radiological hazards of the structures. The need for automatic fire suppression systems in plant areas during decommissioning activities may change, depending on the type of operations being performed in an area, the addition or removal of combustible materials, or the removal of radioactive materials and contamination. The licensee should review plant areas for changing conditions that

could affect the need for automatic fire suppression systems. The inspector should verify that automatic fire suppression systems are installed, tested, and maintained in accordance with the NFPA code of record and would effectively control and/or extinguish fires associated with the hazards in the selected area.

Manual fire suppression systems should be provided in the plant to supplement automatic fire suppression systems and to provide suppression coverage to areas not protected by automatic systems. Decommissioning activities may change the plant configuration and fire hazards, may require the construction of temporary enclosures or structures, and may necessitate the abandonment or removal of automatic fire suppression systems as facilities are dismantled or modified and radiological hazards are removed. Adequate manual fire suppression capability must be provided or maintained based on the decommissioning fire hazards analysis to ensure protection against fire-induced radioactive material releases.

The inspector should consider reviewing the capabilities of the following manual fire suppression systems:

- Standpipe and hose systems should be maintained to provide manual fire suppression capabilities.
- Outside hydrants and hose houses should be maintained to support manual fire suppression of internal fires and to protect against the threat of external exposure fires to those plant areas that contain radioactive materials or SSCs necessary for the prevention or mitigation of radioactive material releases.
- If portable hose packs are used, training and drill conduct should be consistent with their usage.
- If offsite fire responder equipment is credited for manual suppression the compatibility with plant water supply systems (e.g., water pressure requirements, connection compatibility)

The inspector should verify that manual suppression systems are available, tested, and maintained in accordance with the NFPA code of record and would effectively control and/or extinguish fires associated with the hazards in the selected area. The inspector should verify that fire hose stations are installed at their designated locations; the general condition of hoses and hose stations is satisfactory (e.g., there is no corrosion or holes in, or chafing of, the hose; the nozzles are not mechanically damaged and not obstructed; and the valve hand wheels are in place); and access to the hose stations is unobstructed and testing records indicate testing within the normal periodicity, if applicable. Further, inspector should verify that the fire hose lines are capable of reaching all necessary fire hazard locations.

Fire Water Supply

During decommissioning, the plant fire water supply system should be maintained, and the system should be capable of providing the maximum water flow needed to supply automatic fire suppression systems and manual firefighting. The following factors should be considered in determining the adequacy of the water supply:

- Reliability of the water supply source, to provide maximum flow demand for a minimum of 2 hours per Regulatory Guide 1.191, Revision 1, Section C.4.3.1;
- Availability of tanks or other water sources, pumps, fire hydrants, and distribution system;
- Adequate flow and pressure to meet water flow demands of automatic or manual fire suppression, or both, at the point of delivery; and
- Capacity of the water supply source and distribution system. If the water system is a combined domestic, process, and fire system, the system should be capable of supplying the maximum daily consumption or the peak hourly flow rate, whichever is higher, plus the maximum required fire flow.

Decommissioning activities may result in the isolation, removal, or abandonment of portions of the distribution system. Any system changes should be reviewed by the inspector to ensure that adequate flow and coverage are provided for the remaining plant areas that contain radioactive materials, present a fire exposure threat to areas containing radioactive materials, or include systems necessary to mitigate the release of radioactive materials.

The inspector should review the defueled fire hazard analysis to determine what the licensee is using for their fire water supply. If the licensee is using fire pumps, the inspector should verify if the pumping capability is operable and able to supply the water flow and pressure demand. The inspector should verify the general condition of yard fire hydrants is satisfactory to ensure water supplies are available in a fire emergency (e.g., material conditions such as mechanical damage and corrosion).

Some plants credited fire protection water for other than fire protection uses (e.g., utilizing the fire water pumps and water supply as makeup water to the spent fuel pool, station air compressor, emergency diesel generators, and certain security event scenarios). Inspectors should verify that any non-fire suppression use of fire water will not impact the ability to meet the fire suppression water design demands.

Additional Guidance for fire detection and suppression systems for a plant with an approved NFPA 805 fire protection program, can be found in Regulatory Guide 1.191, Revision 1, Section C.6.

b. Fire Barriers

Fire areas are established to prevent or restrict the propagation of fires from one area of a facility to another, to protect personnel, and to limit the consequences of a fire. Based on a defueled fire hazards analysis, fire areas may be redesignated to address the unique hazards and protection requirements of the decommissioning process. The designation of fire areas should be based on consideration of the hazards present; the potential for a fire in a given area to result in an unacceptable release of radioactive materials; the ability to effectively contain, fight, and control the fire using manual suppression; and the ability of personnel to safely evacuate the plant.

Fire areas should be separated by fire-rated barriers. The fire resistance rating of a fire barrier should be commensurate with the potential fire severity in each fire area. The components of fire barriers are walls, ceilings, and floors, along with structural steel

supports such as beams, joists, and columns and fire proofing material. Openings in a fire barrier should be sealed by the installation of fire dampers, fire door assemblies, fire window assemblies, fire-rated penetration seals, and special floor drains.

Fire barrier components and penetration seals should be qualified by testing. The defueled fire hazards analysis should identify and justify any unprotected openings in a fire barrier. The inspector should review that the fire barriers, are effectively maintained, surveillances are performed, and can perform their intended function. During a plant tour, the inspector should visually inspect fire barriers associated with fire areas to ensure they are in good material condition and to ensure functionality. The inspector should review completed surveillances of selected fire doors, fire dampers, and fire barrier penetration seals to ensure that they are being properly inspected and maintained.

Additional guidance for fire barriers for a plant with an approved NFPA 805 fire protection program, can be found in Regulatory Guide 1.191, Revision 1, Section C.6.

c. Fire Protection Equipment

Personnel protective equipment for fire brigades, including turnout gear and self-contained breathing apparatus, should regularly be inventoried, inspected, tested, and maintained to ensure proper performance. The inspector should verify the licensee is maintaining personnel protective equipment in accordance with their fire protection program.

Manual firefighting equipment, including portable and wheeled fire extinguishers, fire hoses, nozzles, tools, fittings, portable lighting, and communication and ventilation devices should be regularly inventoried, inspected, tested, and maintained to ensure proper operation in the event of a fire. The inspector should determine whether firefighting equipment and stations are properly maintained, inventoried, and ready for use. The inspector should verify that the general condition of portable fire extinguishers is satisfactory (e.g., there is no corrosion, the pressure gauge reads in the acceptable range, nozzles are clear and unobstructed, and charge test records indicate testing within the normal periodicity). Access to the fire extinguishers should be unobstructed by plant equipment or other work-related activities. As applicable, the inspector should verify that fire hoses are installed at their designated locations and the general condition of hoses and hose stations is satisfactory (e.g., no holes in or chafing of the hose, nozzle not mechanically damaged and not obstructed, and valve hand wheels are in place).

Inspectors should verify that the changing plant configuration during decommissioning activities should consider emergency lighting and access and egress routes required to perform recovery actions.

Additional Guidance for fire protection equipment for a plant with an approved NFPA 805 fire protection program, can be found in Regulatory Guide 1.191, Revision 1, Section C.6.

03.03 Control of Combustible Materials and Ignition Sources

Combustible materials, including flammable and combustible liquids, compressed gases, cables, construction materials, and refuse, should be used, stored, and disposed of in a manner that minimizes the occurrence of fire. Transient fire hazards associated with decommissioning activities should be minimized to the extent possible, and the hazards should be removed promptly upon completion of the activities. The inspector should evaluate whether the licensee is controlling and storing transient combustible materials in accordance with their administrative procedures. Ensure that the licensee has stored transient combustibles (e.g., aerosols or combustible/flammable liquids) in approved containers and in such quantities as defined by plant procedure.

The inspector should assess whether the licensee is performing hot work (e.g., cutting, welding, and grinding) in accordance with its fire protection program procedures. Dedicated fire watch personnel for hotwork operations should be informed of their specific duties and responsibilities in accordance with licensee procedures. The dedicated fire watch should not be engaged in any other activities and should remain posted for at least 30 minutes after hotwork is complete. The inspector should verify that the fire watch personnel are trained in the use of fire extinguishers.

During a plant tour, the inspector should verify good housekeeping practices are being maintained, with particular attention to areas containing radioactive materials or contaminated waste radioactive products and equipment. General housekeeping practices should be implemented to remove trash and clutter, minimize combustibles, and ensure clear access to egress routes throughout the plant. The inspector should verify that transient combustibles are not located near ignition sources, active cables, and electrical equipment, such as cabinets, switchgears, motor control centers, and transformers.

03.04 Organization

The decommissioning fire protection program should identify and clearly establish the organizational responsibilities for its management and proper implementation. The fire protection responsibilities of licensee contractors should also be established. The organizations responsible for implementing the fire protection program should include an individual (or individuals) adequately qualified in nuclear safety and fire protection engineering, who will ensure that the fire protection program is implemented in accordance with applicable industry codes, standards, NRC regulations, and guidance.

The inspector should review the licensee's training program 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. Plant personnel and contractors should be informed of the proper procedures for reporting a fire, responding to fire alarms, preventing fires, locating and using fire extinguishers, and of the hazards of incipient-stage firefighting. Plant personnel who are assigned manual firefighting responsibilities (use of a fire extinguisher and potentially hoses) should receive training commensurate with their responsibilities. Fire brigade members and responding offsite emergency services personnel should receive training on facility layout, fire hazards, pre-fire plans, firefighting equipment, radiation hazards, and health physics relevant to firefighting operations. If local offsite fire departments are utilized as primary or supporting responder, assess the quality of site-specific training provided regarding radiological hazards and plant configuration.

The plant fire brigade drill schedule should provide for periodic local fire department participation. These drills should effectively exercise the fire event command structure between the plant fire brigade and local offsite responders. Offsite fire department response should be tested periodically, in conjunction with the required exercises of the radiological emergency response plan required by 10 CFR 50.47, "Emergency plans." The inspector should verify that the fire brigade leader has ready access to keys for any locked doors.

Annually, the inspector should verify that the licensee is conducting periodic fire drills to determine the readiness and capability of fire brigade personnel and local offsite responders. The plant training program should be described in writing, and the inspector should review written records of plant fire brigade training. The inspector should verify the licensee has established written mutual aid agreements between the utility and the offsite fire departments that are credited in the fire protection program and listed in the permanently defueled emergency plan. If offsite responders are utilized, the inspector should verify that the licensee offers periodic training to offsite responders and periodically invites offsite responders to participate in an onsite drill. The inspector should verify the process for offsite responder access to onsite areas to verify that their response will not be delayed. Inspectors should refer to Regulatory Guide 1.191, Revision 1, Sections C.3.3.3 and C.4.3.4 for further guidance.

Additional guidance for onsite and offsite firefighting response for a plant with an approved NFPA 805 fire protection program, can be found in Regulatory Guide 1.191, Revision 1, Section C.6.

03.05 Problem Identification and Resolution

Additional guidance can be found in IP 71152, "Problem Identification and Resolution" and IP 40801, "Problem Identification and Resolution at Permanently Shutdown Reactors."

64704-04 RESOURCE ESTIMATE

Note that for all decommissioning inspection activities, the frequency of performance, level of effort needed, and specific inspection requirements to be evaluated and verified vary based on the stage of decommissioning at the facility, the scope of licensee activities, and the overall decommissioning strategy chosen for the plant (i.e., SAFSTOR or DECON). IMC 2561 contains a discussion of the expected inspection frequency and resource estimates during each phase of decommissioning and should be used when planning resources to conduct this inspection.

64704-05 COMPLETION STATUS

Inspection findings, open items, follow-up items, and conclusions, shall be documented in accordance with Inspection Manual Chapter 0610 and other relevant regional or headquarter instructions. Inspections resulting from allegations will be documented and dispositioned in accordance with Management Directive 8.8.

64704-06 REFERENCES

10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

10 CFR 50.48, "Fire Protection."

10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants."

10 CFR Part 100, "Reactor Site Criteria."

10 CFR Part 20, "Standards for Protection Against Radiation."

10 CFR 50.47, "Emergency plans."

Regulatory Guide 1.191, Revision 1, "Fire Protection Program for Nuclear Power Plants During Decommissioning."

END

Attachment 1

Fire Protection Inspection Supporting Documentation

Electronic format is preferred. If electronic media is made available via an internet-based document management system, then document access must allow inspectors to download, save, and print the documents in the NRC's Regional office. Paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this generic document request is not meant to imply that any specific plant is required to have all of the listed documents. It is recognized that some documents listed below may not be available for your plant. In addition, the document titles listed below are based on typical industry document names; your plant specific document titles may vary.

Please provide these documents to the inspection team leader in the Region XX Office by Date XX/XX/XX:

1. Copy of the Post-Shutdown Decommissioning Activities Report.
2. Copy of the Updated Defueled Safety Analysis Report.
3. Copy of the Technical Requirements Manual.
4. Fire Protection Design Basis Document(s) and implementing fire protection program procedure.
5. Defueled Technical Specifications.
6. Copy of the Defueled Fire Hazards Analysis Report.
7. Fire brigade staffing, pre-fire plans, and procedures for firefighting.
8. Copy of agreements with local offsite fire department.
9. List of current fire protection systems and features impairments, including description.
10. List of compensatory measures taken when fire protection systems and features are out of service.
11. List of station procedures used to respond to fire (i.e., Emergency Operating Procedures, Abnormal Operating Procedures, and Annunciator Response Procedures). Include the procedure number, title, and current revision.
12. List of open and closed condition reports for fire protection system issues (e.g., fire pumps, detection, suppression, etc.) since plant shut down. Include the issue report number and a brief description.

13. List of open and closed condition reports related to the fire brigade or fire drills since plant shut down. Include the issue report number and a brief description.
14. Copies of any self-assessments performed, and corrective action documents generated, in preparation for this fire protection inspection.
15. List of changes to the fire protection program including engineering changes/modifications completed.

Attachment 2

Revision History for IP 64704

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	7/15/1981 CN 81-019	Initial Issuance in the SALP program.	N/A	N/A
	8/15/1981 CN 81-021	Revised in the SALP program	N/A	N/A
	3/18/1994 CN 94-008	Revised in the SALP program	N/A	N/A
	9/08/1997 CN 97-014	Revised in the SALP program	N/A	N/A
	6/24/1998 CN 98-010	Revised in the SALP program	N/A	N/A
N/A	ML20294A347 11/05/20 CN 20-059	Major revision. This procedure is a complete re-write and updated to include inspection requirements on fire protection previously listed in IP 71801. Revised to include feedback from inspectors, updated the format and include editorial changes. The content of this procedure was updated to focus on the inspector's efforts on risk informing the inspection.	N/A	ML20294A348