



Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740

www.exeloncorp.com

An Exelon Company

November 1, 2000

SVP-00-165

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: 10 CFR 50, Appendix R Exemptions

- Reference: (1) Letter from J. P. Dimmette (ComEd) to USNRC, "Title 10 CFR 50, Appendix R Exemptions," dated June 2, 2000.
- (2) Letter from J. P. Dimmette (ComEd) to USNRC, "10 CFR 50, Appendix R Exemptions," dated August 3, 2000.

The purpose of this letter is to formally request withdrawal of two exemptions to 10 CFR 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." As part of our 10 CFR 50, Appendix R Optimization Project, ComEd has identified a number of exemptions that are no longer required to support post fire safe shutdown activities at Quad Cities Generating Station. This reduced reliance on 10 CFR 50, Appendix R exemptions has been accomplished through a combination of plant modifications, technical and fire protection evaluations performed in accordance with Generic Letter 86-10, "Implementation of Fire Protection Requirements." A description of each exemption, as well as a summary of our justification is provided in the attachment. Similar submittals have been provided in the Reference (1) and Reference (2) letters.

This action is consistent with our License Condition h.3.F which allows changes to the fire protection program provided the changes do not adversely affect our ability to achieve and maintain post-fire safe shutdown.

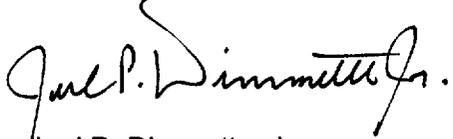
To date, we have requested formal withdrawal of fourteen 10 CFR 50, Appendix R exemptions. This submittal completes our actions aimed at reducing our reliance on Appendix R exemptions at Quad Cities Generating Station. By this letter, we are requesting the NRC to formally revoke these fourteen exemptions, which have been evaluated and determined no longer applicable at Quad Cities Generating Station.

A006

November 1, 2000
U.S. Nuclear Regulatory Commission
Page 2

Should you have any questions concerning this letter, please contact Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,

A handwritten signature in cursive script that reads "Joel P. Dimmette, Jr.".

Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Generating Station

Attachment: Quad Cities Exemptions to 10 CFR 50, Appendix R

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Generating Station

November 1, 2000
U.S. Nuclear Regulatory Commission
Page 3

bcc: Project Manager – NRR
Office of Nuclear Facility Safety, - IDNS
Senior Reactor Analyst – IDNS
Manager of Energy Practice – Winston and Strawn
Director, Licensing and Compliance – ComEd
Vice President, Regulatory Services– ComEd
ComEd Document Control Desk Licensing (Hard Copy)
ComEd Document Control Desk Licensing (Electronic Copy)
W. Leech – MidAmerican Energy Company
D. Tubbs – MidAmerican Energy Company
Regulatory Assurance Manager – Dresden Generating Station
Regulatory Assurance Manager – Quad Cities Generating Station
NRC Coordinator – Quad Cities Generating Station
NSRB Site Coordinator – Quad Cities Generating Station
Site Vice President - Quad Cities Generating Station
Station Manager - Quad Cities Generating Station
SVP Letter File

ATTACHMENT, Quad Cities Exemptions To 10 CFR 50, Appendix R
Page 1 of 3

Exemptions To 10 CFR 50, Appendix R, Section III.G.3

Exemption Title

Justification for Lack of Complete Detection and Suppression In The
Expansion Gap [Unit 1]
(Quad Cities Fire Protection Report, Volume 4, Section 8.2)

Key References

ComEd Submittal Date: July 22, 1986
NRC SE Date: July 21, 1988

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.3, to the extent that it requires the installation of automatic fire detection systems and fixed fire suppression in an area room or zone for which alternate shutdown capability is provided.

Basis for Exemption Withdrawal

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," provides guidance for implementing Appendix R requirements. In accordance with GL 86-10, a technical evaluation can be performed to assess the adequacy of partial suppression and detection to protect against the hazards. Specifically, Enclosure 1, Section 5, states: "Where full area suppression and detection is not installed, licensees must perform an evaluation to assess the adequacy of partial suppression and detection to protect against the hazards in the area."

While fire detection and/or fixed suppression is provided in many of the fire zones, full area coverage is not provided throughout the Unit 1 reactor building, including the Unit 1 drywell expansion gap. A technical evaluation has been completed that demonstrates that the existing Unit 1 fire protection features provide an adequate level of protection. The containment barrier configuration is adequate in the protection of safe shutdown equipment and in the prevention of fire spread between primary containment and the reactor building. The installation of additional fire detection and/or suppression systems would not significantly enhance fire safety in this fire area. For these reasons, we are in compliance with the requirements of 10 CFR 50, Appendix R and associated implementing guidance. Therefore, the subject exemption is no longer required.

Exemption Title

Justification for Lack of Complete Detection and Suppression In The
Expansion Gap [Unit 2]
(Quad Cities Fire Protection Report, Volume 4, Section 8.2)

Exemption Title

Justification for Lack of Complete Detection and Suppression In The
Expansion Gap [Unit 2]
(Quad Cities Fire Protection Report, Volume 4, Section 8.2)

Key References

ComEd Submittal Date: July 22, 1986
NRC SE Date: July 21, 1988

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.3, to the extent that it requires the installation of automatic fire detection systems and fixed fire suppression in an area room or zone for which alternate shutdown capability is provided.

Basis for Exemption Withdrawal

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," provides guidance for implementing Appendix R requirements. In accordance with GL 86-10, a technical evaluation can be performed to assess the adequacy of partial suppression and detection to protect against the hazards. Specifically, Enclosure 1, Section 5, states: "Where full area suppression and detection is not installed, licensees must perform an evaluation to assess the adequacy of partial suppression and detection to protect against the hazards in the area."

While fire detection and/or fixed suppression is provided in many of the fire zones, full area coverage is not provided throughout the Unit 2 reactor building, including the Unit 2 drywell expansion gap. A technical evaluation has been completed that demonstrates that the existing Unit 2 fire protection features provide an adequate level of protection. The containment barrier configuration is adequate in the protection of safe shutdown equipment and in the prevention of fire spread between primary containment and the reactor building. The installation of additional fire detection and/or suppression systems would not significantly enhance fire safety in this fire area. For these reasons, we are in compliance with the requirements of 10 CFR 50, Appendix R and associated implementing guidance. Therefore, the subject exemption is no longer required.