

April 17, 2001

Mr. Oliver D. Kingsley, President
Exelon Nuclear
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: QUAD CITIES - REQUEST FOR ADDITIONAL INFORMATION (TAC NOS.
MA9157, MA9158, MA9685, MA9686, MB0486 AND MB0487)

Dear Mr. Kingsley:

By letters dated June 2, August 3 and November 1, 2000, Commonwealth Edison Company (ComEd), submitted an application to withdraw certain exemptions to 10 CFR Part 50, Appendix R, that have been granted for Quad Cities Nuclear Power Station, Units 1 and 2 (Quad Cities). The applications resulted from the 10 CFR Part 50, Appendix R, Optimization Project at Quad Cities. Subsequent to the applications, ComEd merged to form Exelon Generation Company, LLC. (EGC, the licensee). By letter dated February 7, 2001, EGC assumed responsibility for all pending actions that were requested by ComEd.

In order to evaluate whether the proposed action provides an equivalent level of fire protection and safe shutdown capability to that prescribed in 10 CFR 50.48 and applicable sections of 10 CFR Part 50, Appendix R, the staff requires additional information. Please respond to the enclosed request for additional information (RAI) within 30 days of receipt of this letter.

The attached RAI was provided to your staff on April 11, 2001, to determine whether any clarifications were needed. Your staff did not request any clarifications. If you have any questions about this letter or about the staff's review of your applications, please contact me at (301) 415-1321.

Sincerely,

/RA/

Stewart N. Bailey, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-254, 50-265

Enclosure: Request for Additional Information

cc w/encl: See next page

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* concurred by ADAMS accession nos. ML003760547 and ML010120124

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Quad Cities Nuclear Power Station
Units 1 and 2

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**QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2
REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE WITHDRAWAL OF 10 CFR PART 50,
APPENDIX R EXEMPTIONS**

The following questions are intended to gather additional information which was not provided in the requests for withdrawal, in order to establish a current regulatory baseline and also to identify any changes in analysis from the original exemption requests.

1. For the withdrawal request for the exemption titled, "Justification for Removal of Control Power to Defeat High Impedance Faults (Quad Cities Fire Protection Report, Volume 4, Section 9.1)," in the letter dated June 2, 2000, provide a copy of the procedure for accomplishing the removal of the switches. Provide separately, if not included in the procedure, a list of any tools that are required to remove these switches, a description of the process to remove the switches, and a description of any special training required to remove the switches.
2. For the withdrawal request for the exemption titled, "Exemption to Appendix R, Section III.G.3, For Suppression in the Vicinity of Electrical Equipment (Quad Cities Fire Protection Report Volume 4, Section 1.0)," in the letter dated June 2, 2000:
 - a) Has the re-validated program considered Generic Letter (GL) 86-10 since GL 86-10 supercedes GL 83-33, where applicable?
 - b) It is stated in the Basis for Exemption Withdrawal section that this exemption was superseded by exemption requests resulting from the re-validation efforts. Provide: 1) a reference to the exemption which resulted from the re-validation efforts, and 2) a discussion of how the re-validation exemption supercedes the June 23, 1983, exemption on this issue.
3. For the withdrawal request for the exemption titled, "Exemption to Appendix R, Section III.G.2, for Three Hour Fire Barriers in Fire Zone 1.1.1.1 of Unit 1 and 1.1.2.1 of Unit 2 (Quad Cities Fire Protection Report, Volume 4, Section 1.0)," in the letter dated June 2, 2000:
 - a) Has the re-validated program considered GL 86-10 since GL 86-10 supercedes GL 83-33, where applicable?
 - b) It is stated in the Basis for Exemption Withdrawal section that this exemption was superseded by exemption requests resulting from the re-validation efforts. Provide: 1) a reference to the exemption which resulted from the re-validation efforts, and 2) a discussion of how the re-validation exemption supercedes the June 23, 1983 exemption on this issue.
4. In the letter dated November 1, 2000, each exemption withdrawal request provides an explanation of why a fire in the expansion gap would not spread to outside the expansion gap, but no basis is provided to show that a fire confined within the expansion

gap would not adversely affect redundant safe shutdown equipment which penetrates the expansion gap. Provide a technical justification for concluding that a fire confined within the expansion gap would not adversely affect redundant safe shutdown components routed through the expansion gap.

5. GL 86-10, Enclosure 1, Section 5, addresses 10 CFR Part 50, Appendix R, Section III.G.2, but does not state that this guidance applies to 10 CFR Part 50, Appendix R, III.G.3 applications. Each exemption withdrawal request in the letter dated November 1, 2000, references GL 86-10 as justification that an exemption is not required, since evaluations are permitted where fire detection and suppression do not provide full area coverage. Provide the technical basis for concluding that 10 CFR Part 50, Appendix R, III.G.3, detection and suppression systems may be evaluated based on the guidance provided GL 86-10, Enclosure 1, Section 5.
6. In the letter dated November 1, 2000, it is stated in each exemption withdrawal request that a technical evaluation has been completed which demonstrates that the protection features provide an adequate level of protection, but the application does not provide the basis for this evaluation. Provide a basis and technical justification that the protection features are adequate to protect against the hazards in the area.