



**Commonwealth Edison**  
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April 30, 1979

Mr. Paul W. O'Connor  
Operating Reactors - Branch 2  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**Subject: Responses to NRC Request for  
Additional Information on  
Administrative Controls for Fire  
Protection at Dresden Station Units  
2 and 3  
NRC Docket Nos. 50-237 and 50-249**

**Reference (a): D. L. Ziemann letter to C. Reed dated  
June 29, 1978**

Dear Mr. O'Connor:

Reference (a) transmitted a request for additional information concerning the fire protection administrative controls at Dresden Units 2 and 3. Enclosure 1, Question 2.0 requested CECo. to provide the NRC Staff with a description of Nuclear Mutual Limited's (NML) critiques of fire drills.

Attached are copies of Pages 6, 7 and 8 of the "Implementation of Nuclear Mutual Limited Loss Prevention Program," which outlines the requirements for "Plant Inspections" by NML. Also attached is a copy of Appendix No. 3 of the "Implementation of Nuclear Mutual Limited Loss Prevention Program," which is a "Procedure for Witnessed Fire Brigade Drills." Copies of these documents are submitted in response to the NRC Staff question concerning NML critiques of fire drills.

Thirty (30) copies of this transmittal are provided for your use.

REGULATORY BASKET FILE COPY

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Mr. Paul W. O'Connor:

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Please direct any questions concerning this matter to this office.

Very truly yours,



Robert F. Janeczek  
Nuclear Licensing Administrator  
Boiling Water Reactors

attachments

#### IV. Plant Inspections

The purpose of inspecting the plants is to provide the Members with a report of an independent observation as to the adequacy of each Member's efforts towards loss prevention and to provide Nuclear Mutual Limited a report of loss prevention.

##### A. Inspection Frequency

1. Operating Plants -- one inspection every six months.
2. Plants with unit(s) under construction -- one inspection every two months, but in no case shall the interval between inspections be greater than three months.

This inspection frequency is the maximum interval between plant inspections. The Inspection Contractor may alter this frequency to decrease the maximum interval between inspections as it is considered necessary or worthwhile to provide better loss prevention for any plant.

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## B. Conduct of Inspections.

All inspections shall be pre-arranged with the designated representative of the Member unless Nuclear Mutual Limited requires that an unannounced inspection is performed.

## 1. Inspection Requirements

- a. The Inspector shall confirm his inspection in writing, setting forth an agenda of items to be reviewed during the inspection.
- b. The Inspector shall be accompanied on the inspection tour by a representative designated by the Member.
- c. The Inspector shall witness fire brigade drills in accordance with Appendix 3.
- d. The Inspector shall conduct an exit interview with the appropriate supervisory personnel at the plant and should discuss:
  - (1) Items that can be corrected on the spot. These items will appear only in the "Remarks" section of the Inspection Report if the appropriate supervisory personnel indicate to the Inspector that these items will be corrected immediately.
  - (2) Recommendations for the correction of conditions that are in noncompliance with Property Loss Prevention Standards. These items will appear as recommendations in the Inspector's Report.

## 2. Conditions that Require Immediate Action

IF CONDITIONS ARE OBSERVED THAT REQUIRE IMMEDIATE ACTION (E.G. NONCOMPLIANCE WITH "SHALL" RECOMMENDATIONS) AND ARE NOT CORRECTED DURING THE INSPECTION, THE INSPECTOR SHALL IMMEDIATELY TELEPHONE THE LOSS PREVENTION SUPERVISOR. THE LOSS PREVENTION SUPERVISOR WILL IN TURN ADVISE NUCLEAR MUTUAL LIMITED OF THE CONDITIONS OBSERVED BY THE INSPECTOR.

## 3. Testing of Equipment and Systems Associated with Loss Prevention

It shall be the responsibility of the Member and the Inspector to mutually coordinate the performance of tests where it is necessary for the Inspector to witness these tests. These tests should normally be performed during the routine inspection of

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the plant and also be coordinated with plant outages. Approved test procedures shall be utilized for the acceptance and periodic testing programs.

- a. The Inspector should witness the acceptance testing for the following systems and/or equipment:
  - (1) Fire Pump(s)
  - (2) All Automatic Extinguishing Systems
- b. The Inspector should witness the periodic testing of systems in 3.a. above or other systems and/or equipment at a reasonable frequency which should be determined by the Inspector.
- c. The Inspector shall audit the results of all tests not witnessed by the Inspector.

### C. Inspection Reports

The purpose of the Inspection Report is to provide both Nuclear Mutual Limited and the Member with information that can be utilized for loss prevention and rating of the plant.

#### 1. Report format

Inspection Reports will generally be in one of two formats.

##### a. Original Report

This format will be utilized for all plants. For those plants under construction, the report will be generated as the plant is constructed. For those plants already completed, the report will be generated after the original inspection and revised for major changes in conditions.

##### b. Periodic Inspection Report

This format will be utilized to record information obtained during subsequent inspections. The Periodic Inspection Report shall utilize the Original Report as a basic reference.

## APPENDIX NO. 3

## PROCEDURE FOR

WITNESSED FIRE BRIGADE DRILLS

- PURPOSE:** The purpose of this procedure is to evaluate the effectiveness of the Plant Fire Brigade.
- FREQUENCY:** As a minimum, an annual Fire Brigade Drill should be witnessed by the Inspection Contractor. If the plant personnel are agreeable, it is recommended that the Fire Brigade Drills be held at each inspection. In either case, this does not relieve plant personnel of the responsibility for conducting Fire Brigade Drills in accordance with the frequency required in Appendix A.1 and A.6 of the Property Loss Prevention Standards.
- IMPLEMENTATION:** The Inspector shall consult with the owner's Senior Representative or his delegate at the site on a Fire Brigade Drill. Examples: Simulated truck fire in Fuel Unloading Area, simulated cable tray fire in Cable Spreading Room, simulated transformer fire, simulated switchgear fires, etc. If permission is granted by the owner's Senior Representative or his delegate, the drill will be initiated by the use of the plant alarm system.
- EVALUATION:** The Inspector will evaluate the Fire Brigade's response by observing:
1. Reaction time.
  2. Manpower available.
  3. Appropriateness of equipment used in responding.
  4. Interview of selected Fire Brigade Members regarding the understanding of their duties.
- The Inspector will submit appropriate comments, and if necessary, recommendations on his report.