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Mr. Roby Bevan
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Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REGULATORY DOCKET FILE COPY

Subject: Dresden Station Units 2 and 3
Fire Protection Safety
Evaluation Report
NRC Docket Nos. 50-237/249

Dear Mr. Bevan:

This letter is to confirm the information provided to you earlier in a telephone conversation with Mr. H. K. Stolt of Commonwealth Edison Company. The information, which was requested informally to support a supplement to the Dresden Units 2 and 3 Fire Protection Safety Evaluation Report, is provided in Enclosure 1 to this letter.

Please address any questions you may have concerning this matter to this office.

Very truly yours,

Robert F. Janecek
Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

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Enclosure 1

Information for Supplement to Dresden 2/3
Fire Protection Safety Evaluation

The following is information for Table 2.1 Implementation Schedule for Proposed Modifications-Administrative Controls.

1. The organizational charts for the fire protection of the station have been included as a part of the Technical Specifications.

Schedule - Complete.

2. The licensee has contracted the services of M&M Protection Consultants as an independent auditor to monitor for fire fighting effectiveness of the station fire protection program.

Schedule - Audit to be completed by December 31, 1979.

3. The licensee will review fire brigade performance against the requirements of Section 27 of the NFPA Code 1975.

Schedule - Complete - the station follows NFPA 27.

4. The licensee is providing additional training for all key station brigade personnel at the Great Lakes Naval Training Center.

Schedule - Key station fire brigade personnel are being trained at the Great Lakes Naval Training Center. This is an on-going program which is made use of as the need for personnel training arises.

5. The licensee's corporate quality assurance program is applicable to fire protection. Four criteria of the Branch Technical Position 9.5-1 which are not covered by the quality assurance program will be covered in supplemental site specific procedures or instructions.

- a. There shall be site indoctrination and training programs for fire protection and fire fighting.

Schedule - Indoctrination and training programs for fire protection are being conducted.

- b. There shall be site procedures for the periodic inspection of fire protection systems, emergency breathing and related auxiliary equipment, emergency lighting and communication equipment. These inspections are to assure the acceptable condition of these items.

Schedule - Procedures for periodic inspections have been written and are being implemented.

- c. There shall be site procedures for the periodic inspection of materials subject to degradation such as fire stops, seals and fire retardant coatings to assure these items have not deteriorated or been damaged.

Schedule - Procedures for periodic inspections have been written and are being implemented.

- d. There shall be site schedules and methods for periodic testing of fire protection equipment, emergency lighting and communication equipment to assure that the equipment will function properly and continue to meet the design criteria.

Schedule - Schedules and methods for periodic testing have been established and are being implemented.

- 6. A five-man fire brigade is provided for each operating shift. Each brigade consists of onsite personnel qualified to perform their assigned responsibilities.

Schedule - A five-man fire brigade has been established for each operating shift.

- 7. The diesel fuel oil in the fire pump diesel day tank will be checked periodically for quality. This item has been included in the licensee's Fire Protection Technical Specifications.

Schedule - The diesel fuel oil is being checked periodically for quality.

- 8. The fire water system will be flushed once a year. This item is included in the licensee's technical specifications.

Schedule - The fire water system schedule for flushing once a year is being implemented.

- 9. Hose houses will be inspected to assure compliance with NFPA 24 "Outside Protection".

Schedule - Hose houses have been inspected, and it has been determined that they comply with NFPA 24.

- 10. The obstructions or broken reels found on hose stations F-11, F-22, and F-114 have been removed or replaced.

Schedule - Station hose reels F-11, F-22, and F-114 have been repaired and obstructions have been removed.

11. The licensee will not issue fire hose from the storeroom for reasons other than replacement or use in the fire protection system.

Schedule - A directive has been issued to the storeroom to enforce issuing fire hose for fire protection only.

12. The licensee will provide proper fire fighting nozzles at all locations which go from off to spray to straight stream mode.

Schedule - Proper nozzles have been provided. The nozzles go from off to straight stream to spray mode. There is, however, a deflector in the straight stream mode which modifies the straight stream so that the water stream is broken up. In addition, the fire brigade is trained in the proper usage of these nozzles for fighting all nature of fire.

13. Barricades provided around PIV's (post indicator valves) will be repaired or replaced.

Schedule - The barricades around PIV's have been repaired.

14. Where the post indicator valve stem wrenches are obstructed from full rotation, this obstruction will be removed and damaged hydrant nuts will be replaced.

Schedule - Ratchet type hydrant wrenches have been provided where PIV's interfere with hydrant operation. Damaged hydrant nuts have been replaced.

15. Where doors to the hose houses are obstructed, the obstructions will be removed and the doors inspected periodically to assure accessibility.

Schedule - Hose house doors have been repaired.

16. Each hose house will be checked periodically for inventory of fire fighting gear against NFPA-14.

Schedule - Hose houses have been inspected to verify that they comply with NFPA-14.

The following is a list of completed modifications for Table 2.2. The modifications are listed in accordance with the numbering in the Dresden 2/3 Safety Evaluation Report.

3.1.1 Fire Detection Systems

(8) In the Unit 2 battery room and battery enclosures (5.6).

3.1.3 Fire Water Supply

All shutoff, isolation, and sectionalizing valves which would isolate the water supply to hose stations or fixed suppression systems in the fire water system will be either locked open or provided with tamper proof seals. These valves will be periodically checked to insure that they are open (4.3.1.3).

3.1.4 Hose Stations

Additional hose stations will be provided at the following locations:

- (1) Column row 43N on the reactor building main floor (5.1.4).
- (3) At the entrance to the auxiliary electrical equipment room (5.4).

Additional hose will be added to the hose stations near the following locations:

- (1) Column row 45N and 44L on the reactor building main floor (5.1.4).
- (2) Column row 49E on the turbine building basement floor (5.9.1).
- (3) Near the Unit 2 and Unit 3 feedwater pumps (5.9.3).

3.1.6 Gas Suppression Systems

The auxiliary electrical equipment and computer rooms will be protected by an automatic Halon suppression system and will be backed up by a manually actuated carbon dioxide suppression system (5.4).

3.1.7 Portable Extinguishers

Portable extinguishers suitable for fighting Class A hazards will be provided at the entrance to the auxiliary electrical equipment room (5.4).

3.1.8 Fire Doors

Fire doors will be provided with Class A ratings at the following locations:

- (3) Control room (5.3).
- (4) Auxiliary electrical equipment room (5.4).

3.1.10 Fire Dampers

Ventilation openings in fire barriers protecting safety-related areas will be modified to provide protection equivalent to the fire barrier or a maximum fire rating of three hours. The following areas will be provided with fire dampers:

- (1) Control room (5.3).
- (2) Computer room (5.4).

3.1.11 Protection for Structures

Structural steel supporting the walls and ceiling of the diesel generator rooms will be coated to provide three-hour fire protection (5.8).

Exposed structural steel in the floor of the control room will be coated with a flame retardant coating (5.3).

3.1.12 Portable Ventilation Equipment

Portable ventilation equipment will be provided and procedures will be developed for its use by the fire brigade such that smoke can be vented from enclosed areas to permit access for manual fire fighting (4.4).

3.1.15 Control of Combustibles

The rug in the control room will be replaced with suitable fire resistant materials (5.3).

Curbs will be provided at the entrance to the auxiliary electrical equipment room (5.4).

Curbs will be provided for the diesel generator room and day tank room doors (5.8).

Curbs will be provided for the motor generator set areas (5.9.7).

3.1.18 Fire Barriers

The entrance to the Unit 3 cable tunnel will be isolated from the auxiliary electrical equipment room by a three-hour fire barrier (5.4).

3.1.19 Cable Access

Access will be provided to permit the application of extinguishing agents on cables in risers in the control room (5.3).

A fire ladder will be provided in the control room to provide access to cable tray fires.

3.1.23 Yard Hydrants

Where the location of post indicator valves limits the rotation of a hydrant stem wrench, a ratchet stem wrench will be provided. The hydrant stem nuts will be replaced where they are damaged. Damaged barricades protecting hose houses and post indicator valves will be repaired. Hose houses will be equipped in accordance with the recommendations of NFPA-14 (4.3.1.3).